CIVIC
AID & DEVELOPMENT

Privacy Policy

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PROJECT madagascar

Civic Aid and Development TA Project Madagascar
258 Spring Street Kearney's Spring Q 4350
Civic Aid and Development (CH3138) is a registered charity, for the purpose of the collection of funds from the public in Queensland
ABN 47 619 398 542

1. PURPOSE

The purpose of this policy is to set out the commitment to the protection of personal privacy that Civic Aid and Development has for all those who use or interact with its services.

2. APPLICATION AND SCOPE

This policy applies to Civic Aid and Development (CAD) trading as Project Madagascar. This policy includes how CAD collects and holds personal information in a record that is necessary to service its affiliates, sponsors, donors, employees, contractors, volunteers and those who use its services.

3. REFERENCES

Privacy Act 1988 (Privacy Act) and the Australian Privacy Principles.

4. DEFINITIONS

4.1 Access

This involves an organisation giving an individual information about themselves held by an organisation. Giving access may include allowing an individual to inspect personal information or giving a copy of it to them.

4.2 Disclosure

In general terms an organisation discloses personal information when it releases information to others outside the organisation. It does not include giving individuals information about themselves (this is 'access' see above).

4.3 Personal Information

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 recorded in a material form or not. For example, details about your date of birth, marital status or health information. It includes all personal information regardless of its source.

3.4 Sensitive Information

Is a subset of personal information. It is information or opinion about an individual's 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 or criminal record. It also includes health or medical information, genetic information, and biometric information and biometric templates.

3.5 Use

In general terms, use of personal information refers to the handling of personal information within an organisation including the inclusion of information in a publication.

5. POLICY

CAD is committed to the protection of personal information. CAD is bound by the thirteen Australian Privacy Principles that form part of the Privacy Act 1988 (Commonwealth) (the Privacy Act) and believes that respect for privacy forms part of the ongoing trust we wish to develop with those we provide services to. This Privacy Policy describes how we treat personal information that we hold consistent with this legislation.

5.1 Collection

CAD only collects personal information that is reasonably necessary to conduct our business or that is specifically and knowingly provided to us. This information will be collected by lawful and fair means and will not be collected in an unreasonable or intrusive way. Personal information will be collected directly from the individual concerned, unless it is unreasonable or impracticable to do so.

The personal information that we maintain is kept for the following purposes:

- to provide services as requested;
- to inform those we provide services to about updates or changes to the services we provide, including sending correspondence;
- internal accounting and administration;
- to protect those we provide service to and us from fraud and unlawful activity;
- to provide duty of care; and
- to provide care and support.

When collecting personal information, we will make sure those providing it know:

- who we are and provide our contact details;
- how to access their personal information;
- the primary purposes for which the information was collected;
- who we would usually disclose the personal information to;
- any legislative requirements for collecting the personal information; and
- the main consequences (if any) if they do not provide us with this information.

When contacting someone whose information was given by a third party, for example an emergency contact, the company representative calling will inform them how they came into possession of their personal information.

5.2 Use and Disclosure

We may use and disclose your personal information for the primary purpose for which it is collected. We may also use and disclose your personal information for other purposes you would reasonably expect us to use the information for.

CAD will not use or disclose or permit the use or disclosure of any personal information unless one or more of the following apply:

- the individual concerned has provided consent;

- a reasonable person would expect the information to be used or disclosed;
- it is in accordance with this Privacy Policy;
- we believe that the use or disclosure is necessary where there is a reasonable suspicion of unlawful activity or misconduct of a serious nature that relates to our functions or activities;
- use and disclosure is required or authorised by law;
- we believe the use or disclosure is necessary for the operation, development or administration of CAD or services provided by Project Madagascar;
- we reasonably believe it is necessary to prevent any serious threat to any person's life, health or safety and it is unreasonable or impracticable to obtain consent.

5.3 Data Quality

CAD will make every reasonable effort to ensure that personal information we collect, disclose and use is accurate, complete and up to date.

5.4 Data Security

CAD will take all reasonable steps to protect the information we collect from misuse, loss, unauthorised access, interference, modification or disclosure and keep it secure at all times. Access to information will be limited to those of our employees and volunteers who need it to carry out their duty of care and role functions.

Personal information that is no longer required will be retained, destroyed or permanently de-identified in accordance with Civic Group's internal Retention and Destruction Schedule, and as permitted by the Privacy Act.

CAD holds information in lockable paper-based files as well as electronically. Data stored electronically in a cloud environment will have relevant laws of where the data servers are located i.e. USA, European Union or Australia that may affect who has access to your personal information on record with us. CAD will take all reasonable steps to ensure data stored on these servers remains secure.

5.5 Data Breaches

In the event that CAD becomes aware of a data breach where personal information is accessed or disclosed without authorisation, and that access is likely to result in serious harm, CAD will promptly notify the affected individuals and the Office of the Australian Information Commissioner (OAIC). This is done in accordance with the Notifiable Data Breaches scheme under Part IIIC of the Privacy Act 1988 (Cth), which requires CAD to take all reasonable steps to assess a suspected data breach within 30 days of becoming aware of it, and to notify affected individuals and the OAIC as soon as practicable if the breach is likely to result in serious harm.

5.6 Openness

CAD will take all reasonable steps to let you know, generally, the actual use of information that is collected and the type of personal information that we keep. Information we keep varies on the individual’s involvement level and includes, but is not limited to,

- name, date of birth, gender and contact details;
- any medical or emergency contact details provided by an individual, their next of kin or their parent or guardian to enable us to fulfil our duty of care;
- family relationships;
- details of programs, services or events attended, volunteered at or registered for;
- financial and bank details supplied to enable direct debit or credit card payments or donations;
- history and information about donations and sponsorships, particularly for tax-deductibility purposes;
- details of Police Checks or Working with Children Check Blue Cards and reference checks;
- details of qualifications held;
- details of marketing preferences; and
- details of training undertaken.

5.7 Access and Correction

All people have a right to access the personal information we store about them.

Updates and corrections to personal information that is in use can be made by contacting Reception.

All other requests to view or delete personal information should be directed in writing to the Privacy Officer. CAD will consider each request for deletion and retains discretion to decide whether deletion is appropriate, having regard to its legal obligations and operational requirements. The Privacy Officer or their delegate may require you to provide adequate identification before processing a request. When a written request is received by the Privacy Officer or their delegate, they will arrange a time for you to view the information, or where necessary for the information to be deleted by one of our authorised employees within a reasonable timeframe unless:

- a written refusal has been supplied to you by us;
- it is unlawful to provide the information;
- the request poses a serious threat to the life or health of any individual or misconduct of a serious nature that relates to our functions or activities;
- the request has an unreasonable impact on the privacy of other individuals;
- the request is frivolous or vexatious; or
- there is another exception under law.

If the Privacy Officer determines that an exception applies, they will notify you and give their reasons for the exception. If we refuse your request to access or correct your personal information, we will provide you with information on how you can complain about the refusal. Requests to correct or change information that is not easily accessible or likely to be used will be reviewed by the Privacy Officer and if access is

refused written reasons will be supplied to you and the avenue in which you are able to complain about the refusal (if you are not satisfied with the reasons).

In addition, if we refuse your request to correct your personal information you also have the right to request a statement be associated with your personal information noting that you disagree with its accuracy.

Any fees charged for processing your request to access information will be on a cost-recovery basis only. This charge covers such things as locating the information and supplying it to you. No fee will be charged to request access to information.

5.8 Identifiers

CAD will not adopt any government identity numbering system.

CAD will not use or disclose a Commonwealth government identifier in a way which is inconsistent with the purpose for which they were originally issued. They will only be used where such use or disclosure is either:

- necessary for the company to fulfil its obligations to the agency that assigned the identifier to the individual, or
- in the interest of health or safety.

5.9 Anonymity and Pseudonymity

Where it is lawful and practical to do so, CAD will give people the option of interacting with us anonymously or via the use of a pseudonym. It should be recognised that anonymity or the use of pseudonym will restrict the ability of CAD to contact and provide care for the person and it may limit the person's ability to volunteer or be involved in certain activities.

CAD will not use identifiable images of individuals for any marketing or promotional purposes without their knowledge and consent.

5.10 Cross Border Data Flows

CAD may disclose personal information to recipients located overseas. This occurs where data is stored or processed by CAD's cloud and approved service providers to provide and administer our services and to support efficient and effective workflows and data processing. It also occurs where personal information is disclosed to CAD's personnel and partner organisations in Madagascar for the delivery, administration and reporting of CAD's programs and sponsorships. The countries in which our service providers are located may change from time to time. A current list of locations is available from the Privacy Officer on request.

Any overseas disclosure of personal information will comply with CAD's obligations under Australian Privacy Principle 8 (cross-border disclosure of personal information). This includes where:

- the disclosure is to a service provider approved by CAD following a risk assessment covering data security, privacy and cross-border data handling;
- the disclosure is to CAD's personnel or a partner organisation in Madagascar for the delivery or administration of CAD's programs and sponsorships;

- it is at the request of the person whose information is being disclosed; or
- the information is being provided to the individual concerned.

Before disclosing personal information to an overseas recipient, CAD will take reasonable steps to ensure the recipient handles the information in accordance with the Australian Privacy Principles. These steps include contractual or service arrangements requiring compliant handling, security assessment before a provider is approved, and de-identification of information before it is used outside CAD's controlled environments. CAD remains accountable for personal information it discloses overseas. Sensitive information is afforded a higher level of protection and is handled only within CAD's approved, controlled environments.

5.11 Sensitive Information

CAD will only collect or use sensitive information where it is necessary for us to exercise our duty of care, is legally required or it is information directly related to religious beliefs.

Sensitive information includes:

- an individual's racial or ethnic origin;
- health or medical information;
- political opinion;
- membership of a political association, professional or trade association or trade union;
- religious beliefs or affiliations;
- philosophical beliefs;
- sexual orientation or practices;
- criminal record;
- genetic information; and
- biometric information and biometric templates.

5.12 Automated Decision-Making and Artificial Intelligence (AI)

CAD does not make any decision that could reasonably be expected to significantly affect an individual's rights or interests solely by a computer program. A person makes or approves each of these decisions.

A computer program, including an approved AI system, may substantially and directly contribute to the following kinds of decisions:

- administrative decisions, including scheduling, rostering and resource allocation;
- service delivery decisions, including assessment of eligibility or suitability for programs, services or events;
- screening decisions, including processing of applications from prospective employees and volunteers; and

- financial processing decisions, including processing of payments and donations.

The kinds of personal information used in these decisions include contact and identity details, records of programs, services and events attended or registered for, and other personal information described in the Openness clause of this policy that is relevant to the decision.

Any person may ask the Privacy Officer to review a decision made by, or with the substantial and direct assistance of, a computer program. The decision will be reviewed by a person and a written response provided in accordance with section 7 of this policy.

6. PRIVACY WORK PRACTICE GUIDELINES

6.1 Collection

All forms and documents used to collect personal information will contain the following elements:

- a brief explanation of why the information is being collected, this can be in the form of the document title e.g. 'Child Sponsorship Form'. If this information is to be used for a secondary purpose, for example updating the details on the database, this should be explicitly stated and, if practical, an option provided to opt out; and
- information on the identity of the organisation collecting the information including at least the registered trading name (Project Madagascar) or company name (Civic Aid and Development) and the company ABN (47 619 398 542); and
- information on how to contact us including at least an email or postal address and telephone number; and
- information on what other organisations may have access to this information; and
- the following privacy statement (or similar)

For Project Madagascar

Project Madagascar (ABN 47 619 398 542) collects and uses your personal information for the purposes of administration and care. If you are providing us with information about another individual, for example an emergency contact, it is your responsibility to obtain their consent. If you do not provide us with the information requested we may not be able to provide you with our services. You can access and update your personal information by calling 07 4631 5800 during business hours or submitting a request via email at info@projectmadagascar.org.au. For further information, please view our Privacy Policy located at projectmadagascar.org.au or ask us for a copy. We may use approved artificial intelligence systems to assist in administering our services and care. Our use of these systems is governed by our AI Policy and the Privacy Policy.

6.2 Use and Disclosure

CAD will only use or disclose personal information in ways a reasonable person would expect the information to be used or disclosed.

Collected information will not be used in direct marketing unless you have provided your consent or you would reasonably expect us to use your personal information for that purpose.

You may opt out of receiving marketing or promotional communications at any time by contacting the CAD office or the Privacy Officer. CAD will action your request promptly and without charge.

Where a request is made to disclose or use sensitive information (i.e. with a name), these requests should be in writing or via email directly from the person concerned, or if they are incapacitated and are an affiliate, sponsor, donor, employee, contractor, or volunteer, their legal representative.

Where a request is made by a third party or written confirmation is unavailable any disclosure or announcement will be in an unidentifiable way.

For Project Madagascar

- Personal information will only be entered on Project Madagascar's database where it has been gained with a clear intent that the information is available for Project Madagascar to use for future contact and to offer opportunities to participate in project activities. For example, contact details permission form, direct debit form, sponsorship form, fundraising campaigns.
- Personal information will not be given out to any person who is not a staff member or authorised volunteer or used for non-business purposes.
- Any disclosure to protect the life and safety of any person will be documented. For example, information given to emergency services.

6.3 Data Quality

To keep information correct and up to date, CAD will appoint appropriate administrators who will be responsible for updating general data on the Project Madagascar databases, including;

- entering updates provided on forms and contacting the person concerned to clarify the correct information when data quality appears poor
- updating or removing incorrect contact details when mail is returned or telephone numbers are out of date
- ensuring that requests for 'do not mail' and silent telephone numbers are indicated on the database
- make reasonable attempts to obtain updated contact details when details are known to be out of date.

Affiliates, sponsors, donors, employees, contractors, and volunteers will inform the administrators as soon as practicable when they become aware that information is incorrect or out of date.

For Project Madagascar:

- provide access to the sponsorship platform to update details directly online.

6.4 Data Security

All paper based personal information will be stored in lockable facilities that require either;

- a key; (e.g. lockable filing cabinet, lockable office)
- a Grand Master key; (e.g. the CSO) or
- an electronic code (e.g. a safe).

All users of the computer network will comply with the Computer and Network Use Policy.

All paper based personal information that is no longer required will be shredded if permitted by the Privacy Act. However, approval will be obtained from the Privacy Officer or their representative prior to any documentation being shredded.

6.5 Identifiers

Medicare Card numbers will only be collected where it is required to fulfil our duty of care (e.g. for volunteers) and will only be disclosed for the purpose of gaining medical treatment for the relevant person.

6.6 Anonymity and Pseudonymity

Where it is operationally possible we will give people the option to interact with us anonymously, by the use of a pseudonym or with minimal information being recorded.

Where, for legal reasons, a person cannot attend an event or use a service without providing us with personal information we will explain why the information is required and provide an option to give minimal information or information that will not be entered on the database for other uses.

For Project Madagascar

- People may attend our fundraising events that are open to the public or make donations without providing us any personal information.

6.7 Sensitive Information

Sensitive information including information about appointments and medical and health information will be afforded a higher level of security than general personal information. This means that;

- consent will be obtained from the individual prior to their sensitive information being collected;
- only necessary sensitive information will be collected;
- information about the specific nature of appointments will be stored in secured facilities that are accessible only to relevant authorised staff;
- enrolment forms, volunteer registration forms and any other paper-based record that potentially contains government identifiers or medical information

is locked in a restricted area when not in use and is never left unattended in public areas.

7. ENQUIRIES

If you have any enquiries about the content or operation of this policy, or you would like to access your personal information or believe the information we hold about you is incorrect please contact:

Project Madagascar – 07 4631 5800 or privacy@civicaid.org.au

If you have any concerns about how we are handling your personal information or would like to make a complaint, please contact us on the above details or you can complain to the Office of the Australian Information Commissioner about the way we handle your personal information.

When you make a complaint, the Privacy Officer will acknowledge it, investigate it and provide you with a written response within 30 days. If you are not satisfied with our response, you may refer your complaint to the Office of the Australian Information Commissioner.

The Commissioner can be contacted at:

GPO Box 5288
SYDNEY NSW 2001
Phone: 1300 363 992
Online: www.oaic.gov.au/contact-us

Version Control

Ver.	Amendment Summary	Released	Approved By	Review By
1.0	New Policy	Feb 2019	CAD Board	Feb 2020
2.0	Update footer and file name. Remove policy approval statement. Make clear the purpose, application and scope. Added section on data breaches.	Mar 2024	CAD Board	Mar 2026
3.0	Moved version control to the end of the document. Updated the Personal Information and Sensitive Information definitions to the current Privacy Act 1988 (Cth) wording. Added biometric information to the Sensitive Information list and updated 'sexual preferences' to 'sexual orientation'. Reworked the Cross Border Data Flows clause to align with Australian Privacy Principle 8. Added an Automated Decision-Making and Artificial Intelligence clause. Updated retention wording to reference the Retention and Destruction Schedule. Added an AI disclosure to the privacy statement, a direct marketing opt-out, and a complaint handling process. Updated OAIC contact details and added a privacy email address to the Enquiries section. Updated deletion request wording to a discretionary commitment.	Sep 2026	CAD Board	Sep 2029