



Broadwater Road Uniting Church Privacy Policy

Purpose

Through its functions and activities, the Broadwater Road Uniting Church (**BRUC, we, or us**) interacts with many people in many different ways. The privacy of all individuals with whom we interact (**you**) is very important to us.

BRUC is committed to protecting all personal information we collect and hold. We do this by handling personal information in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth) (**Privacy Act**).

Scope

This policy applies to:

- all functions and activities of the Uniting Church in Australia, Queensland Synod (**UCAQ**) which occur within or in relation to functions and activities within the bounds of BRUC.
- all functions and activities of the Uniting Church in Australia which occur outside the bounds of UCAQ which are managed by parts of the organisation located within the bounds of BRUC
- all personal information (including sensitive information) of all individuals with whom BRUC interacts.

This policy applies in addition to the privacy policy and processes adopted by the UCAQ of which BRUC is a part. In the event of an inconsistency between this policy and the UCAQ policy, the UCAQ policy prevails. The UCAQ policy can be found at https://ucaql.com.au/wp-content/uploads/2018/09/SSC_20180906-Mtg_item-2.4-Privacy-Policy-Att-A.pdf

This policy does not apply:

- to personal information collected by BRUC that is exempted under the Privacy Act
- if BRUC is required or authorised by an Australian law or court/tribunal to collect or use or disclose personal information
- to any functions or activities of the Uniting Church in Australia which are not within or in relation to functions or activities within the bounds of BRUC.

Principles

The types of **Personal Information** we collect includes:

- names, occupation, contact and address details
- date of birth and gender
- Information in identification documents (for example, passport, driver's licence, blue card and other government issued identification)
- bank account details
- details of insurance arrangements
- educational qualifications and courses, employment and volunteer details and history
- personal information about your spouse and dependents
- details of any products, services, information or assistance you have obtained from us or which you have enquired about, together with any additional information necessary to deliver that product or those services, information or assistance or to respond to your enquiries
- other information you provide to us
- commentary or opinion about you.

In order to provide specific products, services, information or assistance or for other purposes, it may be necessary in some circumstances for us to collect **Sensitive Information** (which is a subset of personal information) about you. Examples of the types of personal information that may be collected in such circumstances include:

- professional memberships
- racial or ethnic origin
- religious beliefs or affiliations, including worship details
- criminal history
- health information

Exempt Personal Information

In very limited circumstances, the Privacy Act allows us to deal with (collect, hold or disclose) your personal information other than in accordance with this policy. This is allowed where:

- a) the personal information relates to the BRUC's functions or activities and the information relates solely to the BRUC member or an individual in regular contact with UCAQ in connection with its functions or activities, or

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- b) BRUC reasonably believes the personal information is:
- necessary to lessen or prevent a serious threat to the life, health or safety of any individual or to public health or safety, necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct
 - reasonably necessary to assist in the location of a person who has been reported as missing
 - reasonably necessary to establish, exercise or defend a legal or equitable claim, or
 - reasonably necessary for the purposes of a confidential alternative dispute resolution process.

Why we collect, hold, use and disclose Personal Information

We collect, hold and use Personal Information for a number of purposes including:

- the furtherance of our mission
- to provide products, services, information or assistance requested by you
- to respond to requests or queries
- to maintain contact with you and other contacts
- to keep you informed of our services, developments, information and opportunities
- to notify you of seminars and other events
- to provide you with and manage your access to BRUC's computer resources and protected areas of the BRUC website, social media platforms and internet-based computer applications
- for administrative purposes
- to update our records and keep your contact details up to date
- to process and respond to any complaint made by you or against you
- for purposes relating to engagement of our employees, volunteers and ministers
- to manage any conflicts of interest
- to conduct surveys
- to allow you to interact with our websites or social media platforms
- for seeking your feedback
- to meet any regulatory obligations
- for any other related purpose.

If you do not provide us with the personal information we have requested, we may not be able to provide you with the products, services, information or assistance you have asked us to provide and your experience of our websites or social media platforms may not be as enjoyable or useful.

We may disclose your Personal Information to:

- our employees, volunteers, Ministry Agents or contractors
- our third party service providers including web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers and electronic network administrators
- professional advisers and experts, such as accountants, solicitors and business advisors contracted as part of an engagement
- government or regulatory bodies
- any organisation for any authorised purpose with your express consent

Any part of UCAQ may combine or share any information collected from you with information collected by any other part of the UCAQ.

We may send you direct marketing communications about our products and services that we consider may be of interest to you. These communications may be sent in various forms including mail, SMS or email in accordance with applicable marketing laws such as the Spam Act 2003 (Cth). At any time you may opt out of receiving direct marketing communications from us by contacting us or by using the opt-out facilities provided in the communication.

We do not disclose Personal Information to anyone other than in accordance with this policy. However, we may share de-identified information for research or promotional purposes.

How we collect Personal Information

Unless an exemption applies, we will only collect your sensitive information with your express consent and will only collect your personal information with your consent, which may be implied.

We will collect your personal information directly from you unless it is unreasonable to do so. While collecting personal information from you, we may collect in ways including directly or indirectly through our representatives, use of the BRUC website, use of other BRUC social media platforms, your completion of surveys or otherwise from time to time.

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We may also collect personal information from third parties including law enforcement agencies, social media platforms, other websites, previous employers and other organisations within the broader Uniting Church in Australia such as Presbyteries, Synods, Assembly and separately incorporated entities.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with BRUC as usually we need to know who you are to provide specific products, services, information or assistance to you.

Unless an exemption applies, if you provide us with personal information about someone else, you should only do so if you have their authority or consent to provide us with their personal information. You should also take reasonable steps to inform them of the matters set out in this privacy policy or any BRUC collection statement given to you.

Cookies and IP addresses, social media platforms and internet links

When you access a BRUC website and other online services, we may use software embedded in our website (such as Javascript) and we may place small data files on your computer or other device to collect your personal information or information about which page you view and how you reach them, what you do when you visit a page, the length of time you remain on the page and how we perform in providing content to you. This enables us and our third party host or service provider to recognise your computer and greet you each time you visit without bothering you with a request to register. It may also enable us to keep track of products, services or information that you view so that, if you consent, we can send you news about those products, services or information. We may also use cookies to measure traffic patterns, to determine which area of our websites or social media platforms have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our products, services and information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may gather your IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users' movements, and gather broad demographic information. This information does not identify you personally.

You may wish to participate in various blogs, forums, wikis and other social media platforms hosted by BRUC or on which BRUC participates. One of the aims of these social media platforms is to facilitate and allow you to share content. However, BRUC cannot be held responsible if you share personal information on these platforms that is subsequently used, misused or otherwise appropriated by another user.

Our websites and social media platforms may contain links to other websites and platforms operated by third parties over which BRUC has no control. We make no representation or warranties in relation to the privacy practice of any third parties and we are not responsible for the privacy policies or content of third party websites. Third parties are responsible for informing you about their own privacy policies.

Disclosure of personal information to overseas recipients

BRUC uses data hosting facilities and third part service providers to assist us with our functions and activities. As a result, your personal information may be transferred to, stored at, processed or backed-up at a destination outside Australia. These destinations outside Australia may include, but are not limited to, New Zealand, the United States of America, Singapore, Netherlands, Sweden, Ireland, France, Italy, Spain, Poland, India, Japan, Canada, Brazil and the United Kingdom. We are not able to ensure that these data hosting facilities and third party service providers will comply with Australian privacy laws, although they may have their own privacy laws.

Collection statement

When BRUC collects personal information orally or in writing, a printed copy of the following statement must be provided or, if personal information is being collected via email or through other electronic means, a link to the following statement must be provided to the person from whom the information is collected.

Collection statement

We collect your personal information to enable us to further our mission, respond to your request and maintain contact with you. We may also collect sensitive information about you. You give us your explicit, informed consent to our exchanging your information with any part of the UCAQ, data hosting facilities and any third party service provider or professional advisor for these purposes or purposes reasonable related to them and also for any other purpose you have consented to or as authorised by law. If you provide us with personal information about another person, please make sure that you tell that person about this privacy statement. Further information about what personal information and sensitive information is, as well as why and how we collect, hold, use and disclose it, and how you can access your personal information is available in our Privacy Policy which you can obtain from our website www.bruc.org.au or in printed form following your personal or written request.

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Security

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

As our websites, social media platforms are linked to the internet, and the internet is inherently insecure, we cannot provide assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information you transmit to us online is transmitted at your own risk.

In the event of a data breach or suspected data breach we shall assess the circumstances and evaluate if the breach is one that may pose a risk of serious harm to affected individuals. An investigation will follow and, where serious harm to individuals is assessed as likely, notification may be made to the Office of the Information Commission and to individuals affected.

How you can access your personal information and update it

You may request access to any personal information we hold about you at any time by contacting us. Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it, for example by mailing or emailing it to you. We may charge you a fee to cover administrative and other reasonable costs in providing information to you. We will not charge for simply making the request and will not charge you for making any corrections to your personal information.

There may be an instance 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, would result in a breach of confidentiality, is contrary to natural justice or is prohibited by law. If that happens we will tell you.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it. If you wish to request an amendment to your personal information, you may contact the BRUC Office:

- by email at office@bruc.org.au
- by phone on 07 3849 8548
- by mail addressed as 'Confidential' to the Office Administrator, Uniting Church in Australia, 481 Broadwater Road, Mansfield 4122

Complaints

If you have a complaint regarding interference with your privacy, you may contact the BRUC Office in the first instance:

- by email at office@bruc.org.au
- by phone on 07 3849 8548
- by mail addressed as 'Confidential' to the Office Administrator, Uniting Church in Australia, 481 Broadwater Road, Mansfield 4122

If we are unable to resolve your complaint satisfactorily, you may contact the UCA Qld General Secretary:

- by email at complaints@ucaqld.com.au
- by phone on 07 3377 9702
- by email addressed as 'Confidential' to the General Secretary, Uniting Church Queensland Synod, GPO Box 674 Brisbane QLD 4001

We will treat your complaint confidentially and a representative will contact you to discuss your concerns and outline options regarding how they might be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner. If you are not satisfied with the BRUC or UCA response you can refer your complaint to the Office of the Australian Information Commissioner.

Updates to this policy

BRUC may review, amend and update this policy from time to time. New versions of the privacy policy will be placed on the BRUC website and notification of these updates may be given to individuals who have disclosed their email address to us.