

Mustard Leadership Australia

Privacy Policy



Last reviewed September 2021

How to contact us

If you have any questions or comments, please contact Mustard Leadership Australia's Privacy Officer on (03) 9816 7131 between 9am and 5pm Monday to Friday. Alternatively you can send an email to ops@mustard.org.au or write to: Mustard Privacy Officer, 12 John Street, Kew VIC 3101, Australia

Privacy Policy

1. Purpose and Scope

Mustard Leadership Australia acknowledges and respects the privacy of individuals. Privacy is important to us.

Mustard Leadership Australia is committed to always handling personal information in a safe and secure manner, and ensuring the privacy of this information.

Consistent with our obligations to manage personal information openly and transparently, this policy aims to ensure compliance with our legal obligations, specifically the *Privacy Act 1988 (Cth)* (hereby known as "Privacy Act"), and provide guidelines for the handling of information provided to Mustard Leadership Australia, and provide information on privacy for any interested parties in the operations of Mustard Leadership Australia.

This policy guides Mustard Leadership Australia's handling of data impacted by Australian Privacy Principles and relevant legislation.

This policy shall apply to the use of information provided by staff, student leaders, volunteers, donors and subscribers of Mustard Leadership Australia.

2. Definitions/Terminology Classification

Mustard Leadership Australia is hereby known as "Mustard".

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable: a) whether the information or opinion is true or not; and b) whether the information or opinion is recorded in a material form or not.

Sensitive information is a special category of personal information. Sensitive information means: a) information or an opinion about an individual's (i) racial or ethnic origin, (ii) political opinions, (iii) membership of a political association, (iv) religious beliefs or affiliations, (v) philosophical beliefs, (vi) membership of a professional or trade association, (vii) membership of a trade union, (viii) sexual orientation or practices, (ix) criminal record, that is also personal information; b) health information about an individual, c) genetic information about an individual that is not otherwise health information; d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or biometric templates.

3. Responsibility

It shall be the responsibility of the Privacy Officer of Mustard to ensure this policy is implemented and to manage its compliance.

It shall be the responsibility of all staff to comply with the requirements of this policy.

4. Policy

4.1 What type of personal information do we collect?

We collect personal information from donors, potential donors, event participants, advocacy supporters, church supporters, staff, student leaders, volunteers and people that complete a Mustard form or sign up to receive Mustard communications.

The type of personal information that Mustard collects and holds will depend on the nature of involvement with our organisation.

Depending on the reason for collecting the personal information, the personal information collected by Mustard may include personal or sensitive information, as defined in Section 2 Definitions/Terminology Classification.

Whilst an individual is not required to provide personal and/or sensitive information requested by Mustard, if the individual has chosen not to provide information as requested, it may not be practicable for Mustard to service the individual's needs. For instance, an individual may choose to donate or receive general information anonymously or under a pseudonym; however, Mustard is required to collect and store a minimum level of information in order to issue a receipt if requested.

In circumstances where Mustard receives unsolicited personal information (meaning, personal information received where Mustard has taken no active

steps to collect the information), Mustard will usually destroy or de-identify the information as soon as practicable if it is lawful and reasonable to do so unless the unsolicited personal information is reasonably necessary for, or directly related to, Mustard's functions or activities. For instance we usually retain unsolicited volunteer or employment applications and complaints or feedback.

5.2 How do we collect personal information?

Mustard staff, volunteers and student leaders may collect personal information from individuals from time to time.

We will wherever practicable collect personal information directly from the owner of the personal information, including via phone, face to face, our website, email, SMS, electronic and hard copy forms, social media, and third party online portals.

Mustard will generally obtain consent from the owner of personal information to collect their personal information. Consent may be provided in writing, orally or may be implied through a person's engagement with Mustard.

We will endeavour to only ask for personal information if it is reasonably necessary for the activities that an individual is seeking to be involved in.

4.3 How does Mustard use personal information?

Mustard may collect, hold, use or disclose personal information for the following general purposes:

- to identify an individual;
- for the purpose for which the personal information was originally collected;
- for a purpose for which an individual has consented;
- for any other purpose where the information is used in aggregated form;
- for any other purpose authorised or required by an Australian law; and
- for any other purpose authorised or required by a court or tribunal.

For the purpose of furthering Mustard's mission, information collected is usually used for Mustard's fundraising, advocacy, education and related activities. This includes (but is not limited to) processing donations, issuing receipts and other Mustard material, contact management for Mustard staff and representatives, and analysis to personalise and improve Mustard's supporter engagement.

Mustard may publish the images of supporters, staff, student leaders and volunteers in publications, on social media, or in public advertisements, after obtaining informed consent where practicable.

If an individual has any concerns about their personal information being used by Mustard in any of these ways, they must notify the Privacy Officer of Mustard at ops@mustard.org.au.

4.4 Disclosure

Mustard won't pass information on to third parties except in the following circumstances:

- Information is given to financial institutions/intermediaries for normal bank processing in which case there is a contractual expectation of confidentiality;
- Information is given to communication service providers for bulk processing in which case there is a contractual expectation of confidentiality;
- The Australian Taxation Office or other government authority or Australian law or court order requires or authorises disclosure of information;
- An individual has consented to Mustard disclosing their personal information to a third party;
- Other parties including agents and contractors have agreed to keep information secure and confidential in line with the Australian Privacy Principles (APPs).

When disclosing personal information to a third party, Mustard will take reasonable steps to ensure that the third party does not breach the APPs in relation to the information.

4.5 Direct marketing

From time to time Mustard may send donors, potential donors, event participants, advocacy supporters, church supporters, student leaders, volunteers and people that complete a Mustard form or sign up to receive Mustard communications, updates and information consistent with its mission and future development. Recipients are provided with the option to unsubscribe from communications and may contact Mustard's Privacy Officer if they do not wish to receive such information.

4.6 How does Mustard store personal information?

Mustard ensures all reasonable steps are taken to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure. Personally identifiable information is kept secure—through securely storing paper records, firewalls, password-restricted access to computerised records, routine security risk assessments, and internal policies in relation to access to personal information. Only authorised employees and volunteers have access to this information.

4.7 Keeping details accurate and up-to-date

Mustard is committed to holding accurate and up-to-date personal information.

Individuals are encouraged to contact Mustard at any time to update their personal information. This can be done by contacting Mustard's Privacy Officer.

In the event of an individual contacting Mustard to advise they no longer wish to be contacted, Mustard will ensure that their personal details are removed from the appropriate contact lists.

4.8 How individuals can access their personal information

If an individual wants to access a copy of their personal information that Mustard holds, in order to seek correction of such information they may do so by contacting Mustard's Privacy Officer.

In accordance with the Privacy Act, Mustard may refuse access to personal information in a number of circumstances including where giving access to the information would pose a serious threat to the life, health or safety of a person, giving access would have an unreasonable impact on the privacy of a person, the information relates to existing or anticipated legal proceedings and would not be available under the discovery process, or denying access is required or authorised by an Australian law or court order.

Mustard will handle all requests for access to personal information as quickly as possible.

4.9 How to contact Mustard

If an individual has any questions, comments or complaints about Mustard's Privacy Policy or handling of information, please contact Mustard's Privacy Officer on (03) 9816 7131 between 9am and 5pm (AEST or AEDST) Monday to Friday. Alternatively, they can send an email to ops@mustard.org.au or write to: Mustard Privacy Officer, 12 John Street, Kew 3131 VIC, Australia.

Mustard takes all feedback seriously and any feedback on Mustard's privacy principles or handling of personal information will be investigated and assessed by the Privacy Officer. The feedback will be responded to within a reasonable time from initial receipt.

Further information about individual privacy rights and privacy law can be obtained from the Office of the Australian Information Commissioner by:

- Calling: Privacy Hotline on 1300 363 992
- Visiting: website at <http://www.oaic.gov.au>
- Writing: The Australian Information Commissioner, GPO Box 5218, Sydney NSW 1042

5. Related References

- Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth).
- Health Records Act 2001 (Vic)
- Privacy Act 1988 (Cth) and subsequent Amendments