

# Privacy Policy - External

## REVIEW

<b>Review of this policy will occur every</b>	<b>3 years</b>
<b>Approval Level Required of amendments to this policy by</b>	<b>Audit and Risk Committee (ARC)</b>
<b>Policy Owner</b>	<b>Director of Finance Policy Lead – Head of Governance and Legal</b>
<b>Required on Website?</b>	<b>Yes</b>

## VERSION LOG

Note: \*Where amendments are only approved by ELT and not in line with Approval Level noted in the table above because the nature of the amendment is minor, the existing Next Review Due Date must be retained to ensure review occurs by the appropriate Approval Level.

<b>Version</b>	<b>Author/s</b>	<b>Approved By*</b>	<b>Approval Date</b>	<b>Next Review Due</b>	<b>Comments</b>
V1	Operations	ARC	Nov 2020	Nov 2023	
V2	TSP	ELT	Feb 22	Nov 2023	Interim change in Mar 2024 - change in policy owner and lead, and PO Box address

## Statement

This Privacy Policy sets out the approach which the Australian Committee for UNICEF Ltd (UNICEF Australia, 'we', 'our' or 'us') will take in relation to the handling of Personal Information in accordance with the Privacy Act 1988 (Cth) (Privacy Act). It includes information on how UNICEF Australia collects, holds, uses and discloses Personal Information and the steps we take to protect that information. It also covers how you may access and seek the correction of the Personal Information that UNICEF Australia collects and holds about you. UNICEF Australia respects the privacy of its supporters and others with whom we deal, and is committed to handling the Personal Information you provide us in accordance with the requirements of the Privacy Act.

This policy has been drafted having regard to UNICEF Australia's obligations under the Privacy Act, including the Australian Privacy Principles (APPs).

UNICEF Australia is also a member of the following bodies:

- Australian Direct Marketing Association (ADMA) and we comply with its Code of Practice.
- Australian Council for International Development (ACFID) and we comply with its Code of Conduct.

We may update or revise this Privacy Policy from time to time. You can find the most current version on our website or obtain a copy from our Privacy Officer (see contact details at the end of this privacy policy).

## 1. Collection

1.1 UNICEF Australia will collect Personal Information where the information is reasonably necessary for one or more of our functions or activities or where the collection of information is otherwise permitted by law.

1.2 UNICEF Australia will collect Personal Information from you when you contact us, make an inquiry, make a donation, purchase our products, or otherwise provide us with your Personal Information. This could include when you call us, send us a letter, submit an email to us, apply for a job with UNICEF Australia or subscribe to our newsletter via the website.

UNICEF Australia collects Personal Information about our supporters (financial and non-financial) and members for the primary purpose of enabling us to maintain accurate records about who donates to us; the purpose, if specified, for which donations are made; and so that we may meet our legal obligations, such as providing donors with official receipts for their donations.

UNICEF Australia also collects and uses Personal Information for secondary purposes including:

- Keeping our supporters informed about UNICEF Australia's activities, campaigns and appeals
- Keeping our supporters informed about other services, products, campaigns and appeals which may be of interest to you and offer you the opportunity to subscribe to them
- Offering you the opportunity to participate in surveys carried out by UNICEF Australia or its agents.

We may ask for other information to enable us to better understand who our supporters and others who deal with us are, but the provision of that information is purely voluntary.

1.3 UNICEF Australia will notify individuals (including, but not limited to, our supporters) of the matters listed below at the time of collecting any Personal Information:

- the main reason that we are collecting Personal Information (this reason will be the Primary Purpose); other related Uses or Disclosures that we may make of the Personal Information (Secondary Purposes);
- our identity and how individuals can contact us, if this is not obvious;
- that individuals can access the Personal Information that UNICEF Australia holds about them;
- that individuals should contact UNICEF Australia if they wish to access or correct Personal Information collected by us or have any complaints in relation to Personal Information;
- the organisations or types of organisations to whom we usually Disclose the Personal Information;
- where applicable, any law that requires the Personal Information to be collected;
- the consequences (if any) for the individual if all or part of the Personal Information is not provided to UNICEF Australia.

1.4 Where it is not practicable for UNICEF Australia to notify its supporters and members of all of the Collection Information before the collection of Personal Information, UNICEF Australia will ensure that individuals are notified of the Collection Information as soon as possible after the collection. UNICEF Australia will provide "post collection notification" in those circumstances where it is not practicable to notify individuals about the collection of their personal information before it is collected.

1.5 UNICEF Australia will not collect Sensitive Information from individuals except with express consent from the individual and only where it is necessary for UNICEF Australia to collect such information for an activity or function.

1.6 From time to time, UNICEF Australia may also receive unsolicited personal information, being information that we have not taken active steps to collect. When UNICEF Australia receive such information, we will decide within a reasonable period whether we could have collected it pursuant to the requirements in the APP. If we determine that we could not have collected the information, we will destroy or de-identify it as soon as practicable. Alternatively, if we determine that we could have collected the information and wish to retain it, we will deal with this information in accordance with our obligations under the APP.

1.7 If you are under 18 years of age, you should obtain your parents'/guardians' permission beforehand whenever you provide Personal Information.

1.8 If you choose not to provide personal information that UNICEF Australia request, we may not be able to communicate with you, issue a tax receipt, process donations or provide you with opportunities to participate in surveys carried out by UNICEF Australia or its agents. By providing your personal information to us, you confirm that you have agreed to us collecting, holding, using and disclosing your personal information in accordance with this Privacy Policy.

## 2. Use and Disclosure

2.1 UNICEF Australia collects, holds, uses and discloses Personal Information about individuals for the following purposes:

- processing donations and maintaining accurate records about who donates to us;
- assessing the purpose, if specified, for which donations are made;
- meeting our legal obligations, such as providing donors with official receipts for their donations;
- keeping our supporters informed about UNICEF Australia's activities, campaigns and appeals;
- keeping our supporters informed about other services, products, campaigns and appeals and offering the opportunity to subscribe to them;
- conducting surveys carried out by UNICEF Australia or its agents;
- developing and managing relationships with our employees and contractors and business partners.
- administration of volunteer work; and
- compliance with our legal obligations.
- UNICEF Australia may sometimes disclose names and addresses to third parties for the purpose of allowing them to market their products and services. Such disclosure will be subject to your express consent. Individuals are given the opportunity to opt out of such communications and can contact UNICEF Australia for further details.

### **UNICEF Australia does not sell Personal Information.**

2.2 UNICEF Australia may Disclose Personal Information to unrelated third parties to enable outsourcing of functions (including cloud service providers or third-party contractors for processing, storage and support). Where this occurs, UNICEF Australia takes reasonable steps to ensure that all Personal Information is handled and protected in a manner that is consistent with the Privacy Act 1988 (Cth) and Australian Privacy Principles, preferably as part of the services contract. Examples of such functions include mailing services both postal and email, answering questions about activities and programs, fraud prevention services, data analysis to group demographic attributes of supporters and processing of credit card payments.

2.3 On occasion UNICEF Australia may use or disclose your Personal Information for the purposes of direct marketing and this will be done in accordance with applicable laws. You may opt-out from receiving direct marketing communications at any time. If you would like to opt-out from receiving further direct marketing communications from UNICEF Australia, please contact UNICEF Australia at:

PO Box 587  
 Pyrmont NSW 2009  
 Email: [unicef@unicef.org.au](mailto:unicef@unicef.org.au)

2.4 Sometimes UNICEF Australia extracts information from our collected records to produce aggregated data. This aggregated data does not identify individuals and therefore does not contain personal information. UNICEF Australia uses the aggregated data for research purposes and may share the data with third parties.

### 3. Information Security

3.1 UNICEF Australia will take such steps as are reasonable in the circumstances to protect the personal information that it holds from misuse, interference, loss and from unauthorised access, modification or disclosure. We will take reasonable steps to ensure that hard-copy and electronic records containing Personal Information are transmitted, stored and processed securely. This includes having internal policies that require that records containing Personal Information are only accessible by people within UNICEF Australia who have a genuine “need to know”.

3.2 No data transmission over the internet can be guaranteed to be 100% secure. As a result, while we strive to protect your Personal Information, UNICEF Australia cannot ensure or warrant the security of any information you transmit to us over the internet, and you do so at your own risk. Once we receive your transmission, we make reasonable efforts to try to ensure its security both on our systems and while in transit between our systems and the systems of the companies who provide us with various services.

3.3 UNICEF Australia will take such steps as are reasonable in the circumstances to delete, destroy or de-identify Personal Information should UNICEF Australia no longer need the information for any purpose which is permitted under the Privacy Act and the information is no longer required to be kept by law or an order of a court/tribunal.

### 4. Access and Correction

4.1 Subject to any exceptions in the Privacy Act, you have a right to request access to your Personal Information held by UNICEF Australia and to request the correction of such information.

4.2 If UNICEF Australia accepts a request for a correction, UNICEF Australia will correct its records containing Personal Information within a reasonable period of time after the request of the individual is received. UNICEF Australia will endeavour to correct any information that is inaccurate, outdated, incomplete, irrelevant or misleading and will advise any third parties we have disclosed the information to about the amended provided it is reasonably practicable to do so.

4.3 If you want to lodge a request to access and/or correct your Personal Information you should do so by contacting: The UNICEF Australia Privacy Officer PO Box 587 Pyrmont NSW 2009 Tel: 1300 884 233 Email: [unicef@unicef.org.au](mailto:unicef@unicef.org.au)

4.4 UNICEF Australia will not normally charge a fee for processing an access request unless the request is complex or is resource intensive, in which case UNICEF Australia may charge a reasonable fee to defray the access costs.

## 5. Complaints

5.1 UNICEF AUSTRALIA is serious about privacy and strives to always maintain the highest standards for safeguarding your privacy. However, if you are concerned in any way of how we manage and maintain your personal data, you can please contact our privacy officer and discuss your concerns. We will register your complaint and will address the concerns at earliest possible

5.2 Contact with UNICEF Australia via phone or web inquiry will be the first point of contact for inquiries or complaints about privacy issues.

5.3 If you wish to make a complaint about a breach of the APPs, you should direct your complaint to: The UNICEF Australia Privacy Officer PO Box 587 Pyrmont NSW 2009 Tel: 1300 884 233 Email: [unicef@unicef.org.au](mailto:unicef@unicef.org.au)

5.4 UNICEF Australia will endeavour to manage any privacy related complaint efficiently and within a reasonable time period. If you are unhappy with the outcome of your complaint, you may take your complaint to the Australian Council for International Development (ACFID) using the information as set out in this website [www.acfid.asn.au](http://www.acfid.asn.au).

## 6. Transferring personal information overseas

6.1 UNICEF Australia may disclose your Personal Information to overseas recipients in order to achieve the purposes outlined in this Privacy Policy.

6.2 UNICEF Australia is likely to disclose personal information to its related entities, third party contractors and service providers which are located overseas or may perform certain services overseas. For instance, a third-party contractor may utilise a server hosted overseas as a method to send emails to UNICEF Australia's supporters. Where this occurs, UNICEF Australia takes reasonable steps to ensure that all Personal Information is handled in a manner that is consistent with the Australian Privacy Principles, preferably as part of the services contract. These overseas recipients are likely to be located in countries including Ireland, the United States, the Philippines, and Japan.

6.3 In order to keep our costs down, UNICEF Australia may change its overseas service arrangements from time to time. Where it does so, UNICEF Australia will update this Privacy Policy. We encourage you to check this Policy from time to time.

## 7. Online Privacy

7.1 To the extent that this Privacy Policy applies to online privacy issues, it is to be read as forming part of the Terms of Use for our website. Generally, UNICEF Australia will handle Personal Information collected online consistently with the way that it handles Personal Information collected offline. Matters which are specific to the handling of Personal Information online are as follows:

7.2 Cookies For each visitor to our website, our server automatically recognises and stores the visitor's domain name. In addition, our website uses cookies. To enhance your experience when using our website, these cookies may automatically collect information from you such as pages viewed and donation details if made. We also use cookies for tracking the statistics of our website. This allows us to better understand our users and improve the layout and functionality of our website. This tracking is conducted in such a way to

ensure the anonymity of visitors. Most web browsers are set by default to accept cookies. However, if you wish to restrict or block web browser cookies you can do this through your browser settings via the 'Help' function. Alternatively, you may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org), which contains comprehensive information on how to do this on a wide variety of desktop browsers.

**7.3 Third party cookies** To better communicate UNICEF's work, we sometimes embed photos and video content from websites such as Flickr and YouTube. Pages with this embedded content may present cookies from these websites. Similarly, when you use one of the 'share' buttons on our website, a cookie may be sent by the service you have chosen to share content through. UNICEF Australia does not control the dissemination of these cookies; you should check the relevant third-party website for more information about these. In addition, if you linked to our website from a third party website, we cannot be responsible for the privacy policies and practices of the owners or operators of that third party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

**7.4 Secure Online transactions** If you make a purchase through our website, we process your credit/debit card details securely over the Internet using an accredited internet payment security system. With the combination of SSL encryption on our website and a secure browser at your end, we take reasonable measures to ensure that your credit/debit card and Personal Information are protected when you donate online. We also recommend that you take appropriate security precautions when accessing the internet via public Wi-Fi networks or shared computers.

**7.5 Social Media** Our website and mobile site may contain links to online forums. Think carefully before you post or publish any Personal Information in these forums as it will be publicly available.

## ANNEX 1: Glossary

**Collection Information** means the information outlined in 1.3 notified to individuals prior to, or as soon as practical after, the collection of their Personal Information.

**Communications** means the marketing of activities, campaigns, appeals and services by way of written, verbal or electronic means. The activities, campaigns, appeals or services which are marketed may be those of UNICEF Australia or a Related Body Corporate.

**Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or the opinion is true or not and whether the information or the opinion is recorded in a material form or not. Examples of personal information we may collect from you include (but may not be limited to):

- Your full name;
- Home and postal addresses;
- Contact details (such as email addresses and phone numbers);
- Date of birth;
- Information about gifts or services you have ordered from us;
- Financial information such as bank or credit card details;
- Social media handles and other social media profile information that you make available to us or the public;
- Records of our interactions with you;
- Response to Surveys, Personal preferences for Marketing Interactions

**Primary Purpose** is the dominant or fundamental reason for information being collected in a particular transaction.

**Sensitive Information** means information or an opinion about an Individual's:

- racial or ethnic origin; or
- membership of a political association; or
- religious beliefs or affiliations; or
- philosophical beliefs; or
- membership of a professional or trade association; or
- membership of a trade union; or
- sexual preferences or practices; or
- criminal record: that is also Personal Information; or
- Health Information about an individual

### **Contacting UNICEF Australia**

If you require further information regarding UNICEF Australia's Privacy Policy Contact Us.

Telephone: 1300 884 233

Suite 4.02, Building B, 33-35 Saunders Street, Pyrmont, NSW 2009