

# UNICEF Australia Privacy Policy

## 1. Policy Statement

The Australian Committee for UNICEF Limited (**UNICEF Australia, we, our or us**) respects your privacy and is committed to handling your personal information in accordance with all applicable laws, including the Australian Privacy Act (the **Privacy Act**).

## 2. Purpose

This policy explains:

- what Personal Information we may collect and how we collect it;
- how we hold, use and disclose Personal Information, including the steps we take to protect it;
- how you may access the Personal Information we hold about you and seek correction and deletion of it; and
- how you may raise a concern or complaint about the way in which we handle your Personal Information.

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

## 3. Key terms

Throughout this policy:

**Personal Information** means information or an opinion about an individual who is identified or reasonably identifiable.

There is a sub-set of Personal Information known as Sensitive Personal Information.

**Sensitive Personal Information** means Personal Information 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, or trade union;
- sexual orientation or practices;
- criminal record;
- health, including an illness, disability or injury an individual and health services provided or to be provided to that individual.

This distinction matters as we treat, and are required to treat, Personal Information and Sensitive Personal Information differently in some circumstances.

## 4. What Personal Information may we collect?

**Personal Information:** We may collect Personal Information where it is reasonably necessary for one or more of our functions or activities, or where the collection is otherwise permitted by law.

**Sensitive Personal Information:** As we are a not-for-profit organisation, we may collect Sensitive Personal Information if the information relates both:

- to our activities; and

- solely to our members or to individuals who have regular contact with us in connection with our activities.

In addition, we may collect other Sensitive Personal Information if:

- is it reasonably necessary for, or directly related to, our activities or functions; and
- you have consented to the collection, or the collection is otherwise permitted by law.

Consent may be expressly provided or reasonably inferred from your conduct and ours in relation to the collection, except where you are under the age of 18. If so, then we will only collect Sensitive Personal Information about you with your consent and the express consent of your parent or guardian, or where we waive that requirement because it is impractical or otherwise inappropriate to obtain such consent.

The main kinds of Personal Information we may collect are out in the Schedule to this policy.

## 5. How might we collect your Personal Information?

We collect your Personal Information from you, unless it is unreasonable or impractical to do so. The main ways we collect Personal Information are set out below.

Collection type	How might collection occur?
<b>You give it to us</b>	<p>Collection might occur when you:</p> <ul style="list-style-type: none"> <li>contact or meet with us;</li> <li>donate to us or purchase our products or services;</li> <li>subscribe to our newsletters;</li> <li>attend one of our events, travel with us or attend a program we support;</li> <li>consent to our use of your image or statement or otherwise complete one of our forms;</li> <li>apply to work with us;</li> <li>participate in a project or funding submission with us; or</li> <li>supply goods or services to us.</li> </ul>
<b>We collect it ourselves or another person collects it on our behalf</b>	<p>Collection might occur when you interact with us in person or via our website or U-Report or other mobile application, other social or digital pages, or our call centre.</p> <p>In addition, it may occur when our external service providers, including our telemarketing or face-to-face marketing service providers, interact with you.</p> <p>It also may occur when you attend an event or visit a program we support.</p> <p>We may also collect opinions about you that we have generated via our own research and analysis, such as opinions about the likelihood that you would support a particular campaign, appeal or program.</p>
<b>We obtain it from another person</b>	<p>Collection might occur when we obtain the information from:</p> <ul style="list-style-type: none"> <li>your representatives and professional advisors, for example where you have asked us to communicate with those persons;</li> <li>your referee or former employer or a government authority, for example when you are applying for a role with us;</li> <li>where you are under 18 years of age, your parent or legal guardian;</li> <li>Australia Post's National Change of Address Service where you have consented to Australia Post providing you change of address details to us;</li> </ul>

	<ul style="list-style-type: none"> <li>• a service provider providing fundraising prediction and intelligence services; or</li> <li>• a publicly available source or commercial information provider.</li> </ul>
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## 6. What are the consequences if you chose not to provide the Personal Information we request?

If you choose not to provide Personal Information we request, the main consequences are that we may be unable to:

- communicate with you or communicate as effectively with you;
- issue a tax receipt to you;
- process your donations;
- send our newsletters to you;
- tailor a supporter opportunity to you;
- provide you with opportunities to attend our events or participate in our surveys;
- permit you to visit our premises or a project we support;
- involve you in implementing a project with us; or
- consider you for, or offer you, employment, a volunteer role or other role with us.

## 7. How do we hold your Personal Information?

**Protection:** We take steps that are reasonable in the circumstances to protect the Personal Information that we hold from misuse, interference, loss and from unauthorised access, modification or disclosure. This includes:

- taking reasonable steps to ensure that hard-copy and electronic records containing Personal Information are transmitted, stored and processed securely; and
- having internal policies that require that records containing Personal Information are only accessible by our people who have a genuine “need to know”.

**Transmission:** No data transmission over the internet can be guaranteed to be 100% secure. As a result, while we seek to protect your Personal Information, we cannot ensure 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 take reasonable steps to ensure its security, both within our systems and while in transit between our systems and the systems of our various service providers and other stakeholders.

Further, if you make a donation or purchase through our website, we process your payment details securely over the Internet using a trusted payment gateway with industry standard encryption. Our website uses SSL (Secure Sockets Layer) encryption technology and, when paired with a secure browser at your end, we take reasonable measures to ensure that your payment details and other Personal Information are protected when you make a donation or purchase online.

**Destruction or De-identification:** We take such steps as are reasonable in the circumstances to delete, destroy or de-identify your Personal Information when:

- we no longer need the information for any purpose for which it may be used or disclosed as permitted under the Privacy Act or you request that we delete it; and
- we are no longer required to keep the information by law or a court/tribunal order.

## 8. How might we use your Personal Information?

We may use your Personal Information for the main purposes set out in the Schedule to this policy.

## 9. How might we disclose your Personal Information?

We may disclose your Personal Information for main purposes set out in the Schedule to this policy.

In each case, we seek to ensure that third parties to whom we disclose personal information only use that personal information for the purpose for which it was provided, keep that information secure and report data breaches to us.

## 10. Direct marketing

**Direct Marketing** means using or disclosing your Personal Information to communicate directly with you to promote goods and services. Communication may occur through a variety of media including telephone, SMS, mail, email and online advertising.

We only use or disclose your Personal Information (other than Sensitive Personal Information) for Direct Marketing purposes if:

- we have collected that Personal Information from you;
- you would reasonably expect that we would use or disclose that Personal Information for that Direct Marketing purpose;
- we provide you with an easy way of opting out of the Direct Marketing, such as an “unsubscribe link”;
- you have not previously opted out of our Direct Marketing.

Alternatively, we may use or disclose your Personal Information (other than Sensitive Personal Information) for Direct Marketing purposes if:

- we have collected the Personal Information from you or another person;
- you have consented to the use or disclosure of your Personal Information for Direct Marketing purposes, or it is impractical to obtain your consent;
- we provide you with an easy way of opting out of the Direct Marketing, such as an “unsubscribe link”;
- we draw your attention to the fact that you may opt out of the Direct Marketing; and
- you have not previously opted out of our Direct Marketing.

We only use or disclose your Sensitive Personal Information for Direct Marketing purposes if you have consented to that use or disclosure for that purpose.

If you would like to opt out of any marketing, whether provided by us or one of our third parties, you can contact us using the contact details at the end of this policy.

## 11. How might we transfer your Personal Information outside Australia?

**Overseas disclosure:** We may disclose your Personal Information to overseas recipients, such as UNICEF and our external service providers, when performing our functions or activities.

**Reasonable steps:** When we do so, we take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to that Personal Information or we disclose the information as otherwise permitted under law.

## 12. Cookies

We use various types of cookies on our website.

**Essential:** These cookies are necessary for our website’s operation, enabling core functions such as page navigation.

**Performance and functionality:** Unlike essential cookies, these cookies improve our website’s functionality but are not necessary. For example, a cookie may enable you to set a language or privacy preference.

**Analytical and customization:** These cookies allow us to track and analyse visitor browsing history on our website. They also allow us to gather statistical data on the use of our website, enabling us to enhance our

website and your experience of it. If we are aware of your identity, for example, because you transact via our website, we may match your browsing history with your donor profile.

**Advertising:** These cookies allow third parties to track your use of our website and to target interest-based advertising to you when you browse other websites.

Most web browsers are set by default to accept cookies. However, if you wish to restrict or block cookies you can do this through your browser settings. Alternatively, you may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org), which contains comprehensive information on how to do this.

### 13. Access, correction, notification and deletion

We take reasonable steps to ensure the Personal Information we collect is accurate, up-to-date and complete. By way of example, if you call our Supporter Experience Team, they may confirm that your telephone number and address as recorded in our systems remain correct.

**Access:** You may access the Personal Information we hold about you on request, unless an exemption applies under the Privacy Act. There is no cost for making a request and we will respond to it within a reasonable time. There may be an administrative cost associated with providing the information to you. If so, we will let you know before we provide it to you, so that you can decide whether you wish to access it.

**Correction:** You may request correction of Personal Information we hold about you, unless an exemption applies under the Privacy Act. If you do, we must take reasonable steps in the circumstances to correct that information to ensure, having regard to the purpose for which we hold it, it is accurate, up-to-date, complete, relevant and not misleading. There is no cost for making a request and we will respond to it within a reasonable time.

**Notification:** Where we correct Personal Information about you that we have previously disclosed to another organisation, you may request we notify that other organisation of the correction. If you do, we take reasonable steps in the circumstances to provide that notification.

**Deletion:** You may request that we delete the Personal Information we hold about you. There is no cost for making a request and we will respond to it within a reasonable time. If you do, we take reasonable steps in the circumstances to delete or de-identify the information, subject to any legal or contractual obligations which may require us to retain it.

**Contact our Privacy Officer:** You can request access, correction, notification or deletion by contacting our Privacy Officer using the contact details at the end of this policy.

### 14. Concerns and complaints

**Contact our Privacy Officer:** If you have a concern or complaint about how we handle your Personal Information, please contact our Privacy Officer using the contact details at the end of this policy. If you have a complaint concern breach of the Privacy Act, our Privacy Officer may ask you to put that complaint in writing.

**Our response:** We will seek to respond to your concern or complaint efficiently and within a reasonable time. If our Privacy Officer is unable to resolve your concern or complaint when you contact them, either our Supporter Experience Team or our Privacy Officer will acknowledge that your concern or complaint has been received, and let you know when they expect to update you on the status of your concern or complaint.

**Elevating your complaint to ACFID:** If you are unhappy with our response to a complaint regarding a breach, you may raise it with the Australian Council for International Development (ACFID) using this link: [Contact Us - ACFID](#)

We are a signatory to the ACFID Code of Conduct which obliges us to be truthful in our communications, collect and use information ethically and to meet our legal and compliance obligations, including under the Privacy Act. As signatories, we are also subject to an ACFID's independent mechanism to address concerns relating to our conduct.

Elevating your complaint to the Australian Privacy Commissioner: Alternatively, or if you are not satisfied with ACFID's response to a complaint regarding a breach of the Privacy Act, you may raise it with the Australian Privacy Commissioner using this link [Lodge a privacy complaint with us | OAIC](#).

## **15. Contacting our Privacy Officer**

If you require further information regarding this policy, or a version in a different format, please contact our Privacy Officer using the following contact details:

PO Box 587 Pyrmont NSW 2009

Tel: 1300 884 233

Email: [privacy@unicef.org.au](mailto:privacy@unicef.org.au)

## Schedule – Collection, Use and Disclosure

Information type	What Personal Information might we collect?	How might we use your Personal Information?	How might we disclose your Personal Information?
<b>Supporter Information including corporate contacts and UNICEF Australia ambassadors</b>	<ul style="list-style-type: none"> <li>Your name, address, contact details and age</li> <li>Your donation and other supporter history</li> <li>Your payment details</li> <li>Your communication and subscription preferences</li> <li>Any disability or vulnerability that may be relevant to your support of us</li> <li>Your reasons for donating to, or otherwise supporting, us</li> <li>The programs you may wish to support in future and the likelihood that you would support them</li> <li>Any other charities, causes or people you support and your capacity to give</li> <li>Socio-demographic information such as your gender, marital status, number of dependents, occupation and nationality</li> <li>Your interests, opinions and affiliations, including political and religious</li> <li>The feedback you provide to us and responses you provide to our surveys</li> <li>Your interactions with our Supporter Experience Team, other staff members and external service providers, such as our mailhouse and telemarketing services providers</li> <li>Your response to any marketing we provide to you, including whether you open email marketing</li> <li>Our opinions related to your propensity to donate to us based on our modelling and analysis</li> </ul>	<ul style="list-style-type: none"> <li>To process your donation, provide you with a tax receipt and allocate your donation to the campaign or appeal you chose to support</li> <li>To personalise our communications with you including to let you know about the impact of your giving and to keep you updated on our work</li> <li>To keep you informed about our campaigns and appeals, and our services and products, in case they are of interest to you</li> <li>To invite you to attend our events and participate in our other activities, including visits to programs we support</li> <li>To build a partnership with you</li> <li>To tailor program support opportunities to your preferences</li> <li>To perform research and analysis to enable us to raise funds now and in future</li> </ul>	<ul style="list-style-type: none"> <li>To our payment systems operators to enable us to collect donations from you</li> <li>To our mailhouse, telemarketing and other marketing services providers so that they may provide those services to us</li> <li>To our fundraising predictions and intelligence services providers so that they may provide those services to us</li> <li>With your consent, we may disclose your experience of partnering with us to other potential donors as an example of the opportunities we offer</li> </ul>

Information type	What Personal Information might we collect?	How might we use your Personal Information?	How might we disclose your Personal Information?
<b>Information gathered via Cookies</b>	<ul style="list-style-type: none"> <li>If you visit our website, we may collect your browsing history on that website via the use of cookies. Where we can identify you, for example, because you transact using our website, your browsing history may be matched with your donor record.</li> <li>If you browse our website, cookies from certain trusted third parties may collect the browsing history associated with your accounts or IP address</li> </ul>	<ul style="list-style-type: none"> <li>To customize and improve your experience when you interact with our website</li> <li>To gather statistical data on how users, such as yourself, interact with our website, so that we may improve it</li> <li>To show you relevant advertisements about our campaigns and appeals, and our services and products.</li> </ul>	<p>When third parties collect the browsing history associated with your IP address, they may use it:</p> <ul style="list-style-type: none"> <li>to track your activity across websites;</li> <li>to gather statistical data on how users, such as yourself, interact across various websites; and</li> <li>to target you with interest-based advertisements, including regarding our campaigns, appeals, services and products, in case they are of interest to you</li> </ul>
<b>Bequests and Deceased Estates</b>	<p>When you leave us a bequest or let us know that you intend to do so, we may collect details of that bequest including:</p> <ul style="list-style-type: none"> <li>the value of, and assets comprising, your estate;</li> <li>your other beneficiaries, family members and administrator; and</li> <li>the details of any dispute in relation to your estate to which we are party.</li> </ul>	To seek to ensure that the intent of your bequest is fulfilled	To Births, Deaths and Marriages registries in connection with receipt of your bequest
<b>Advocacy Enabling Information</b>	<p>When you create a user profile in our U-Report application, we may collect your contact details, age group, gender and location.</p> <p>If you use Facebook Messenger to register with U-Report, we may collect your account name, given this channel requires creating a Facebook Page that will identify from which Facebook Account the message is being sent.</p> <p>When you interact with U-Report, we may collect information you provide via U-Report channels including responses to survey questions, interactions</p>	<p>We may use the information we collect via our U-Report mobile application:</p> <ul style="list-style-type: none"> <li>to understand the general demographic characteristics of U-Report users and to provide them with relevant information</li> <li>to communicate with you, invite you to participate in surveys, focus groups, events and other activities, invite you to interact with our chatbots, and send information to you and</li> <li>to undertake analysis and research, including in relation to child rights.</li> </ul>	<p>We may disclose your Personal Information collected via our U-Report application on a de-identified and aggregated cohort basis, for the purposes of advocating for children and young people, both in Australia and overseas.</p> <p>A cohort might be dependent on gender, age group or location.</p>



Information type	What Personal Information might we collect?	How might we use your Personal Information?	How might we disclose your Personal Information?
	with chatbots and any unsolicited messages you send to us.		
<b>Information relevant to Child Safeguarding and Prevention of Sexual Exploitation and Abuse (CSPSEA)</b>	Information regarding any incidents of: <ul style="list-style-type: none"> <li>harm and abuse against children and young people; and</li> <li>sexual abuse and exploitation of adults who are the beneficiaries of, or community members involved, in the programs we support.</li> </ul>	<ul style="list-style-type: none"> <li>To safeguard the children and vulnerable people with whom we interact</li> <li>To investigate CSPSEA incidents</li> <li>To strengthen our CSPSEA systems, policies and practices</li> </ul>	<ul style="list-style-type: none"> <li>To third parties to safeguard children or vulnerable adults</li> <li>To law enforcement agencies</li> <li>To the Department of Foreign Affairs and Trade where a CSPSEA incident has occurred in connection with a DFAT-funded program</li> </ul>
<b>Recruitment, Directorship, Employment or Volunteering Information</b>	<ul style="list-style-type: none"> <li>Your name, contact details, date of birth, and right to work in Australia</li> <li>Your resumé, professional memberships and educational and work history</li> <li>Notes from your interviews with us and our interviews with your referees</li> <li>Outcomes of your National Criminal Check and Working with Children Check</li> <li>Your passport number, driver's licence number and other forms of identification</li> <li>Your bank and superannuation account details and your tax file number</li> <li>Your emergency contact details</li> <li>Your membership of a professional organisation</li> <li>Your salary and other remuneration</li> <li>Your performance and conduct-related information</li> <li>Diversity-related information including in relation to your ethnicity, gender, carer's responsibilities and religious or cultural holidays</li> <li>Your health information, including:               <ul style="list-style-type: none"> <li>your health conditions where relevant to your role with us</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>To consider your directorship, employment, independent contractor or volunteer application</li> <li>To contact you about future work or volunteering opportunities</li> <li>To recruit, onboard, manage, second and develop our directors, employees, independent contractors and volunteers</li> <li>To safeguard the children and vulnerable people with whom we interact</li> <li>To comply with our diversity-related policies, practices and reporting requirements</li> <li>To remunerate our employees and independent contractors</li> <li>To maintain our workplace safety and wellbeing and address workplace incidents</li> <li>To manage work, health and safety matters, and diversity and inclusivity matters and to manage conflicts of interest</li> </ul>	<ul style="list-style-type: none"> <li>To external service providers including those providing:               <ul style="list-style-type: none"> <li>recruitment and temporary agency services and</li> <li>payroll and salary packaging services</li> </ul> </li> <li>To third parties to safeguard children or vulnerable adults</li> </ul>

Information type	What Personal Information might we collect?	How might we use your Personal Information?	How might we disclose your Personal Information?
	<ul style="list-style-type: none"> <li>health information to facilitate workplace adjustments to support you to perform at your best and</li> <li>health information set out in medical certificates you provide to us and invoices for vaccinations and other medical expenses paid for by us</li> </ul>		
<b>Supplier and Implementing Partner Information, including supplier and partner employees and other staff</b>	<ul style="list-style-type: none"> <li>Your name, and contact and payment details</li> <li>Your qualifications, skills and experience</li> <li>Activities you undertake when fulfilling supplier and partner contractual obligations</li> <li>Outcomes of your National Criminal Check or Working with Children Check where your role involves contact with children or vulnerable communities</li> </ul>	<ul style="list-style-type: none"> <li>Where you are a supplier (or employed by, or contracted to, a supplier):               <ul style="list-style-type: none"> <li>to assess your ability and suitability to provide relevant goods and services to us</li> <li>to administer any contract for the supply of goods or services you have with us; and</li> <li>to evaluate the quality and timeliness with which the goods or services were provided to us.</li> </ul> </li> <li>Where you are an implementing partner (or employed by, or contracted to, a partner):               <ul style="list-style-type: none"> <li>to support a funding submission; and</li> <li>where a funding is granted, to administer and evaluate grant use.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>To third parties to safeguard children or vulnerable adults</li> <li>Where you are a supplier (or employed by, or contracted to, a supplier), to other suppliers with whom you need to interact to provide services to us.</li> <li>Where you are an implementing partner (or employed by, or contracted to, a partner) to the funding provider to apply for the grant and, if awarded, provide any reporting required in relation to the grant's use.</li> </ul>
<b>Member Information</b>	Your address, contact and payment details, and meeting attendance and participation, including, voting at member meetings	To process your membership, to communicate with you including in relation to members meetings and membership fees	
<b>Visit, Event and Travel Information</b>	<ul style="list-style-type: none"> <li>If you visit our offices, we may collect the date on which you visited and the purpose for your visit.</li> <li>If you attend one of our events or any of our other activities, we may collect your contact details, work history and political affiliations. Where we seek to ensure diverse attendance at an event, we may also collect your age, gender and ethnic origin.</li> </ul>	<ul style="list-style-type: none"> <li>To invite you to visit our office and to manage your health and safety when you are on our premises</li> <li>To invite you to our events or other activities, to cater for those events, and to brief our executives who will attend events with you</li> <li>To invite you to visit programs we support and to arrange your itinerary, flights,</li> </ul>	<ul style="list-style-type: none"> <li>If you attend one of our events, to people including the event host, event manager, and event security to ensure the smooth running of the event</li> <li>If you travel to a program we support, to people including our travel, accommodation and security services providers, and our program host and</li> </ul>

Information type	What Personal Information might we collect?	How might we use your Personal Information?	How might we disclose your Personal Information?
	<ul style="list-style-type: none"> <li>If you travel to a program we support, we may collect your visit itinerary, passport and visa details, emergency contact details, health-related information, and flight, accommodation and dietary preferences. In the interests of child safety, before your visit a program we support, we may collect the outcomes of your National Criminal Check or Working with Children Check.</li> <li>Additionally, we may collect your images and statements, along with your consent to use them, particularly in connection with your event participation and program visits.</li> </ul>	accommodation and meals, and depending on the location, your security while you travel	program manager to ensure the smooth running of the visit
<b>Business Administration</b>	See the various information types above	Various internal business purpose including in relation to strategy, risk, communications, people, systems, processes and data.	To enable other people to provide us with products and services, including our providers of: <ul style="list-style-type: none"> <li>payment services</li> <li>credit assessment services</li> <li>fraud prevention services</li> <li>information technology services and related infrastructure, including website and hosting services</li> <li>data analytics services</li> <li>insurance and audit services and</li> <li>professional advice.</li> </ul>
<b>Compliance</b>	Outcomes of anti-money laundering and counter-terrorism financing ( <b>AML/CTF</b> ) checks where we undertake such checks to ensure we comply with AML/CTF laws and contractual obligations.  See the various information types above.	<ul style="list-style-type: none"> <li>To meet our legal and contractual obligations, and to comply with our policies, including to prevent financial crime including fraud, terrorist financing, bribery, money laundering, terrorist financing and other breaches of trade sanctions</li> <li>Where the use is otherwise required or authorised under Australian law.</li> </ul>	<ul style="list-style-type: none"> <li>To government authorities and other persons where the disclosure is otherwise required or authorised under Australian law.</li> <li>For the purposes of establishing, exercising or defending a legal or equitable claim</li> </ul>