



# RAWCS Privacy Policy

JUNE 2024

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## 1. Introduction

### 1.1 Who we are

1.1.1 Rotary Australia World Community Service Ltd (RAWCS) is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC). We back doing good by supporting and facilitating a broad range of humanitarian and development projects, both in Australia and in developing countries. RAWCS administers three Tax Deductible funds:

1. **Rotary Australia Overseas Aid Fund (RAOAF):** This fund supports efforts by Rotary Clubs, Rotary Districts and other partners to deliver humanitarian assistance in developing countries. RAOAF focuses on both sustained development and immediate disaster response, working collaboratively with communities to deliver impactful, sustainable projects to meet identified needs.
2. **Rotary Australia Benevolent Society (RABS):** RABS supports Rotary Clubs, Rotary Districts and other partners to respond to specific community challenges within Australia. It offers an avenue for wider community involvement through tax-deductible donations. The Rotary Australia Compassionate Grants Projects within RABS uses matching funds from donations, such as those provided by Dick Smith's Trust, to assist Australians facing hardship.
3. **Rotary Australia Relief Fund (RARF):** This fund is dedicated to responding to national appeals and efficiently disbursing funds to appropriate aid projects. RARF's focus is on mobilising rapid support during national crises, such as natural disasters, providing a structured channel for public generosity to be transformed into effective aid. This fund acts as a hub for contributions from both Rotary and non-Rotary sources, ensuring swift and effective aid delivery to disaster-affected areas.

### 1.2 Purpose

- 1.2. RAWCS is committed to protecting the privacy of all of its stakeholders including its donors, partners, associates, staff, volunteers, Board members, committee members project beneficiaries who interact with RAWCS or its programs.
- 1.2.2 RAWCS is bound by the *Privacy Act 1988* (Cth) and the privacy provisions of any other privacy state or territory related legislation applicable in Australia. In particular, RAWCS must adhere to the *Australian Privacy Principles* in relation to collecting, holding, using, disclosing, securing and allowing access to your personal information. This policy explains how we handle your personal information.

### 1.3 Scope and Governance

- 1.3.1 This policy applies to RAWCS and all of its administered funds and subsidiaries – referred inclusively within this policy as RAWCS.
- 1.3.2 This policy applies to all RAWCS staff, volunteers, Board members, committee members, suppliers and contractors. Within this policy all of these are represented by the term: “**our people**”.
- 1.3.3 This privacy policy also applies to our program partners and supporters.
- 1.3.4 Any personal information collected by us is covered by this policy.

## 1.4 Policy References

1.4.1 This policy supports our compliance with the following:

- *Privacy Act 1988* (Cth)
- Australian Privacy Principles, schedule 1 to the *Privacy Act 1988* (Cth)
- *Health Records and Information Privacy Act 2002* (NSW)
- Data Provisions Requirements 2010 (Cth)
- *Freedom of Information Act 1982*
- State and Territory Privacy Laws and Principles; State based Health Privacy Laws
- ACFID Code of Conduct
- RAWCS Cyber Security Policy
- RAWCS Code of Conduct
- RAWCS Complaint Handling Policy and Procedure
- RAWCS Whistleblower Policy and Procedure

## 1.5 Definitions

Term	Definition
<b>Personal Information</b>	Information or an opinion about an identified individual, or an individual who is reasonably identifiable: <ul style="list-style-type: none"> <li>• whether the information is true or not; and</li> <li>• whether the information or opinion is recorded in a material form or not.</li> </ul>
<b>Sensitive Information</b>	A subset of personal information and has stricter requirements for collection, storage, use and disclosure. It includes information about a person’s race, ethnic origin, religion, criminal record, sexuality, health, or union activity. (This is the same meaning as defined in the <i>Privacy Act 1988</i> ).
<b>Health Information</b>	Information on physical and mental health, disability, health preferences, use of health services etc. (This is the same meaning as defined in the <i>Privacy Act 1988</i> ).
<b>Supporter</b>	An individual, trust or organisation that provides a financial donation or in-kind support or goods to RAWCS.
<b>Program Partners</b>	Individuals or organisations that RAWCS works with, accompanies and supports to deliver humanitarian and development programs or activities and assist in natural disasters.

## 2. Principles

### 2.1 Guiding Principles

2.1.1 **Integrity:** We are guided by our core value of integrity and our Code of Conduct and when collecting, storing and using information.

2.1.2 **Individual rights:** We respect the rights of individuals to keep their personal information private and to ensure that it is accurate.

2.1.3 **Compliance:** RAWCS is bound by the Australian *Privacy Act 1988*. We will also comply with the privacy laws in other countries where we operate.

## 3. Policy Commitments

### 3.1 *Your personal information*

- 3.1.1 The kinds of personal information collected by RAWCS may (but does not always) include:
- the names, contact information (eg mailing address, phone number and email address), date of birth, gender and financial information (eg bank account or credit card details) of our donors;
  - details of donors' donation history, emails, letters and other interactions with RAWCS;
  - the names, contact information and employment and volunteering history of potential staff or volunteers;
  - the names and email addresses of persons who subscribe to our emails.
- 3.1.2 We may also collect and hold sensitive information of our staff, Board members and volunteers or prospective staff and volunteers, including CVs, completed police checks, Working with Children Checks, references and medical information.

### 3.2 *How we collect personal information*

- 3.2.1 RAWCS usually collects your personal information directly from you when you provide it over the phone, through our website, by email, through an online form or through a donation coupon when making a gift to RAWCS.
- 3.2.2 When it is necessary to collect your personal information, including from a third party, we will take such steps as are reasonable in the circumstances to ensure that you are notified in compliance with the Privacy Act.
- 3.2.3 RAWCS will not collect, hold, use or disclose sensitive information (including health information or criminal records) about you unless you give us your consent to do so, or where required by law.
- 3.2.4 If you wish, you can remain anonymous or use a pseudonym when you contact us and if you make a donation. We will respect your anonymity. If you choose not to provide us with your personal information, we may not, for example, be able to provide you with an official tax-deductible receipt or a letter of thanks, or assist you fully with your query or complaint.

### 3.3 *Our website and your privacy*

- 3.3.1 In order to understand how people arrive at the RAWCS website and related social media platforms and how they use it, we rely on cookies provided by third parties. We may also use your browsing history on the RAWCS website to send related messages on our work and appeals. Cookies do not reveal personal information, such as your name, address, phone numbers or email address. You can adjust your browser to disable cookies, but this may restrict your ability to access certain areas of our website.

### **3.4 How we store personal information**

- 3.4.1 We understand the importance of protecting your personal information from misuse, loss or unauthorised access or use and will take all reasonable steps to ensure that your personal information is secure.
- 3.4.2 We hold your personal information securely through physical and electronic means. We have restricted physical access to our offices, hard copy files are stored in secure cabinets and store rooms, and staff are trained in our privacy procedures. We use security encrypted response forms to protect the personal and financial information you provide us over the Internet and secure online payment systems, our in-house IT system is secured with a firewall and anti-virus scanners, your information is stored in secure databases and only authorised staff have access to your information and only when it is required.
- 3.4.3 RAWCS will destroy or de-identify your personal information when we no longer need it for the purpose for which it was collected, unless the law requires otherwise. If you send us your personal information when we don't ask for it we will determine whether or not the information is related to one or more of our activities. If the information is not relevant to what we do, we may destroy or de-identify the personal information if it is lawful and reasonable to do so.

### **3.5 How we use your personal information**

- 3.5.1 We use your personal information to carry out our charitable, aid and related activities. For example, we use your personal information to:
- process any donations you may send to us;
  - send to you information about RAWCS including newsletters, updates and information on appeals;
  - update you if we have information that may affect your support;
  - confirm who you are when you contact us;
  - keep you informed about our work including by mail, email, SMS or telephone;
  - respond to your questions, comments, compliments or complaints;
  - circulating questionnaires to improve our services;
  - analyse donor activity in order to improve our effectiveness including for quality assurance;
  - report on our activities including producing our Annual Report.
- 3.5.2 RAWCS relies on the generosity of our donors to carry out our work. Therefore, we may also use your personal information for direct marketing purposes to promote our upcoming events, appeals, projects or other activities. However, where we do use your information for this purpose, we will always provide a simple means for you to opt out of receiving these communications.

### **3.6 Opting Out**

- 3.6.1 If you wish to opt out of communications you are currently receiving, use any of the clear links that we provide in all our digital communication or by contacting RAWCS on +61 2 8833 8306 or [info@rawcs.org.au](mailto:info@rawcs.org.au)

### **3.7 Collection and usage of information**

- 3.7.1 We collect solicited personal information directly from our stakeholders when they make contact with us through various channels, including in-person, online, over the phone or in written form. By visiting our website at: <https://rawcs.org.au/> ; making a donation; signing up to our newsletter; filling out a survey; applying for employment; applying to be a volunteer; or providing us with their information by any other means, our stakeholders acknowledge that their information is being solicited, collected, used and stored in accordance with this Privacy Policy.
- 3.7.2 We take reasonable steps to ensure that stakeholders are informed when their information is being collected. In these instances, we provide stakeholders with the following information:
- RAWCS's contact details;
  - the nature of the information and the manner in which it was collected;
  - whether RAWCS's collection of information is authorised by law;
  - the reasons RAWCS collected personal information;
  - the consequences for RAWCS if personal information is not collected;
  - RAWCS's usual disclosure procedures of collected information;
  - reference to RAWCS's Privacy Policy;
  - whether RAWCS is likely to disclose personal information to overseas recipients.
- 3.7.3 Personal information that we may collect from staff, volunteers and partners includes:
- personal details such as name, signature, or date of birth;
  - contact details;
  - employment history, educational qualifications, tax file numbers and volunteering history.
- 3.7.4 Personal information that we may collect from project beneficiaries includes:
- personal details such as name;
  - on a limited basis, contact details such as phone number or email address;
  - the location and nature of the RAWCS-affiliated project the beneficiary is engaged in;
  - images and video footage of project beneficiaries;
  - stories and personal accounts of a project beneficiary's experience with a RAWCS-affiliated project; and
  - sensitive information such as a beneficiary's health status.
- 3.7.5 RAWCS ensures that the express consent of a beneficiary is obtained when collecting such sensitive information.
- 3.7.6 A child or their guardian must give their free, prior and informed consent for RAWCS to collect and publish their personal information and identifying images for communications purposes.
- 3.7.7 Personal information that we may collect from donors includes:
- personal details such as name, signature, or date of birth;
  - contact details;
  - payment details including debit or credit card details and bank account information;
  - donation history.

- 3.7.8 Such information is reasonably necessary for us to process donations and to send relevant information to donors such as tax-deductible receipts and remittance advices. We have limited access to donors' payment details, restricted to information necessary for identification purposes.
- 3.7.9 Donors are entitled to decline the collection of their personal information by contacting us directly. However, donors that wish to initiate an ongoing relationship with us, or to receive payment information such as tax-deductible receipts may have to provide us with their personal details.
- 3.7.10 We use donor's personal information to perform fundraising and direct marketing activities. Direct marketing may include contacting our stakeholders via email, postage or phone call. For example, we may wish to send newsletters, publications and event communications to donors. Within our register of donor information, a field is included to specify those donors who have opted-in to receive direct marketing communications.
- 3.7.11 Donors are able to opt out of receiving direct marketing communications at any time. All email and postage direct marketing communications provide a link for stakeholders to unsubscribe from future RAWCS correspondence. Donors contacted by phone have the option to opt out of future direct marketing communications by expressing such to the contacting RAWCS representative. Alternatively, donors can opt out of direct marketing communications at any time.
- 3.7.12 Personal information that we may collect from website visitors includes:
- personal details such as name or date of birth;
  - contact details;
  - statistical data such as IP address, web browser, or website pages visited.

### **3.8 *Disclosing your Information***

- 3.8.1 We respect that who we share your information with is important to you. In no instances do we sell your information onto other third parties.
- 3.8.2 We will only use and disclose your personal information in accordance with the *Privacy Act 1988* and the *Australian Privacy Principles*. This may include where use or disclosure is required by law, where we have your consent to the use or disclosure, or for the purpose for which it was collected or related purposes that you would reasonably expect RAWCS to use or disclose that personal information.
- 3.8.3 We will not disclose information about you to any other individuals or organisations apart from with our own hired contractors and service providers that we engage on a confidential basis to help fulfil our fundraising activities
- 3.8.4 We may also use and disclose your personal information to overseas providers such as cloud service providers. Before we send your personal information overseas, we will take reasonable steps to ensure that the recipient will not breach the *Australian Privacy Principles*, including contractual obligations to treat your personal information in substantially the same way as required under the *Australian Privacy Principles*.



3.8.5 For any other circumstances where we need to disclose your personal information overseas, we will expressly inform you of the disclosure and obtain your consent.

### **3.9 Payment card security**

3.9.1 We are committed to the ongoing security of cardholder data. As a small, low-risk organisation with limited resources for information security assessment, we take a pragmatic risk approach to the Payment Card Industry Data Security Standard (PCI DSS). This industry-standard framework consists of policies and procedures aimed at optimising the security of credit, debit, and cash cards. We focus on implementing security controls that effectively address the most significant risks to cardholder data within our specific operational context.

### **3.10 Help us keep your information accurate**

3.10.1 We aim to ensure that the personal information we hold about you is accurate, complete, up-to-date, relevant and not misleading. However, the accuracy of this information is largely dependent on the information you provide. To assist us with this, please contact us if you are aware of any changes required to your personal information. Even if you don't contact us, if we are satisfied that, having regard to the reasons for which we hold your personal information, that personal information is inaccurate, incomplete, out-of-date, irrelevant or misleading, we may take reasonable steps to correct that information.

## **4. Responding to data breaches**

### **4.1 Breaches of privacy**

4.1.1 In accordance with the *Privacy Act (1988)*, RAWCS has various strategies in place to respond to a data breach of the personal information of its stakeholders. A data breach occurs when personal information that an entity holds is subject to unauthorised access or disclosure, or is lost. For example, data breaches commonly manifest themselves through the loss or theft of a personal device or paper records, or inadvertent disclosure of personal information to an unauthorised third party, either due to human error or inadequate identity verification of a scammer.

4.1.2. As required under the Notifiable Data Breaches Scheme contained in the *Privacy Act 1988*, we must notify affected individuals and the Office of the Australian Information Commissioner when a data breach is likely to result in serious harm to an individual whose personal information is involved. A data breach occurs when personal information an organisation or agency holds is lost or subjected to unauthorised access or disclosure. For example, when:

- a device with a customer's personal information is lost or stolen;
- a database with personal information is hacked;
- personal information is mistakenly given to the wrong person.

4.1.3 In the event of uncertainty whether an eligible instance of data breach has occurred, we will conduct an internal assessment to determine whether the steps of the Notifiable Data Breaches Scheme need be followed.

## 5. Accessing your information

### 5.1 Your Rights

- 5.1.1 You have a right to access, update and correct personal information that we hold about you. Requests for access to personal information should be made by email, post or phone.
- 5.1.2 Before providing access to or correcting your personal information, we may also require you to verify your identity. In the unlikely event that we are unable to provide you with access to your personal information, we will provide you with written reasons for denying access.

## 6. Enquiries and complaints

### 6.1 We want to hear from you

- 6.1.1 Enquiries or concerns about privacy matters, including complaints about how we handle personal information and concerns that RAWCS has breached the *Australian Privacy Principles*, should be made in writing to: [info@rawcs.org.au](mailto:info@rawcs.org.au)
- 6.1.2 We will respond to all enquiries as quickly as possible. We normally have a very fast turn-around so if you've not heard back, feel free to call us.
- 6.1.3 If you would prefer to deal with us anonymously, you are not required to provide your personal information to us unless we are required by law to deal with individuals who have identified themselves or it is impractical for us to deal with individuals who have not identified themselves.

## 7. Roles and Responsibilities

Roles	Responsibilities
<b>National Board of Directors</b>	<ul style="list-style-type: none"> <li>• Ultimate accountability for our organisational policies</li> <li>• Guiding the governance and culture of RAWCS through strategic leadership</li> <li>• Demonstrating a commitment to a culture of protecting privacy and leading by example</li> <li>• Approving this policy and holding the CEO accountable to how effectively this policy is implemented</li> <li>• Overseeing the investigation of serious complaints and providing input and a response, if necessary</li> </ul>
<b>CEO</b>	<ul style="list-style-type: none"> <li>• Ensuring this policy is upheld</li> <li>• Demonstrating a commitment to a culture of protecting privacy and leading by example</li> <li>• Informing the Board of any concerns relating to complaints that may present risk to RAWCS or our people</li> <li>• Ensuring all our people are accountable to this policy</li> </ul>

<b>National Manager Projects &amp; Volunteers</b>	<ul style="list-style-type: none"><li>• Ensuring all project participants are aware of, and comply with this policy.</li><li>• Fostering a culture of integrity by actively promoting and supporting whistleblowing channels to report unethical behaviour or policy violations</li></ul>
<b>All our people</b>	<ul style="list-style-type: none"><li>• Understanding and following this policy</li><li>• Ensuring that your actions are in line with this policy, and that your work reflects the Guiding Principles and Policy Commitments above</li><li>• Not encouraging others (directly or indirectly) to breach this policy.</li></ul>

## 8. Failure to comply with this Policy

- 8.1. Any breach of this Policy by our people may be regarded as misconduct and may result in disciplinary action (up to and including dismissal where relevant).

## 9. Policy Distribution

- 9.1 We will ensure that all our people and partners are notified of and made aware that they are required to comply with the policy.

- 9.2 This policy will be publicly available on our website.

## 10. Review

- 10.1 We are committed to continuous improvement to our policy, procedures and practices. This policy will be reviewed at least every three years by the CEO and approved by the National Board of Directors to ensure it is working in practice and updated as required.

- 10.2 Feedback on this and other policies is openly encouraged from our people, partners, stakeholders and the communities we work with. Feedback, as well as emerging good practice and collaborative lessons learnt across the development sector, will be used to strengthen this and related policies and procedures.

## 11. More information

- 11.1. If you have a query about this policy or need more information, you can contact us via:

- email: [info@rawcs.org.au](mailto:info@rawcs.org.au)
- phone: +61 2 8833 8306
- post: Rotary Australia World Community Service Ltd  
25/1 Maitland Place  
Maitland Place  
Norwest NSW 2153  
Australia

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