



This Policy applies to:

- ✓ Committee Members
- ✓ Staff
- ✓ Donors
- ✓ Supporters
- ✓ Fundraisers
- ✓ Students
- ✓ Visitors and volunteers

Privacy Policy

Overview

This policy is intended to ensure that the privacy of individuals is protected when we collect, use, disclose and store personal information.

Compliance with this policy will reduce the risk that we breach the Australian Privacy Principles (APPs) or any other privacy obligations.

We are committed to observe principles aligned with the APPs, as set out in Appendix 1.

This policy requires us to only:

- collect an individual's personal information if we need it; and
- use or disclose an individual's personal information as we say we will (or as otherwise permitted by the APPs).

We will also securely store an individual's personal information, provide access to the individual on request and destroy it when we no longer need it.

Defining the concepts

In this section, we say what we mean by personal information and sensitive information. These expressions are defined under the Privacy Act 1988 (Cth).

Personal information

Any information (or an opinion about) an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

Common examples are an individual's name, signature, address, telephone number, date of birth, gender or sex, medical records, bank account details, employment details and any commentary or opinion about a person.

Sensitive information

This is a subset of personal information and means:

- Information or an opinion 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
 - > membership of a trade union
 - > sexual orientation or practices; or
 - > criminal record;
- Health information about an individual
- Genetic information about an individual
- Biometric information and templates.

Growing Cambodia

A reference to Growing Cambodia includes GCI and GCO.

Collection

GCI's purpose

GCI is a charity registered with the Australian Charities and Not for profit Commission (ACNC) and has Deductible Gift Recipient (DGR) status from the Australian Taxation Office. Its purpose is to facilitate a self-sufficient and sustainable quality of life for rural Cambodians through education and enhancement of health and well-being.

We do this by raising funds in Australia and sending them to Growing Cambodia Organization (GCO) in Cambodia to support:

- the teaching of English in rural communities
- the sponsorship of further education for graduates of our supported schools; and
- initiatives to encourage better health care, clean drinking water and a sustainable environment for the villages.

As well as providing funding, GCI provides 'hands on' support to GCO through regular consultation and advice, visits from GCI committee members and a Volunteer and Visitors program that encourages donors and other supporters to take an active role in our education and sustainability activities.

Primary purpose for collecting personal information

GCI collects personal information for the primary purpose of funding and conducting our charitable activities and meeting our governance obligations.

We will generally collect personal information about an individual from the individual concerned. However, GCO may collect information about applicants for tertiary sponsorships on our behalf.

We only collect personal information that we need. For example, we need to collect personal information from:

- donors in order to solicit donations and provide them with tax deductible receipts and to communicate with them about our fundraising events and charitable activities
- other supporters in order to solicit prizes and gifts and communicate with them about our fundraising events and charitable activities
- fundraisers in order to inform them of their obligations when raising funds on behalf of GCI
- intending visitors and volunteers in order to facilitate their travel to, and volunteering activities at, our supported schools and to comply with legal obligations
- applicants for tertiary sponsorship in order to assess and approve their applications and maintain funding records
- members and committee members to comply with our governance obligations.

We also collect personal information about employees of GCO in order to communicate with them about the activities they perform on our behalf in Cambodia.

GCI does not usually collect sensitive information about an individual as we do not need it for our purposes but, if we did need it, we would only collect it with the individual's consent.

Notification of collection of personal information

When GCI collects personal information about an individual we will notify them about our primary purpose for collecting the information by referring them to the privacy collection notice on our website. Our privacy collection notice is in Appendix 2.

Use and disclosure

Use and disclosure of personal information for a primary purpose

GCI will only use or disclose personal information about an individual for the purpose of funding and conducting our charitable activities and meeting our governance obligations, unless we are permitted to use the information for a secondary purpose.

For example, we may use personal information to communicate with donors, supporters, fundraisers and intending visitors and volunteers.

We will not publicly disclose personal information about individual donors, supporters and fundraisers without their consent.

We will disclose personal information about visitors and volunteers to GCO to facilitate their visit or volunteer activities at our supported schools.

We may disclose personal information about students we are or have sponsored in their tertiary studies to report to tertiary patrons and other supporters about the success of our charitable work.

We will disclose personal information about our members and committee members to the ACNC to meet our governance obligations.

Use and disclosure of personal information for a secondary purpose

Personal information will only be used for a secondary purpose where:

- the individual would reasonably expect GCI to use or disclose the information for that secondary purpose (and the secondary purpose is related to our primary purpose); or
- the use or disclosure is required or authorised by or under an Australian law or a court order.

Direct marketing

Direct marketing is the use of disclosure of personal information to communicate directly with an individual to promote goods or services.

GCI will not use or disclose personal information it holds about an individual for direct marketing unless an exception under the APP applies. For example, there is an exception if the individual provided their personal information to GCI and would reasonably expect GCI to use their personal information to communicate with them about our fundraising events and charitable activities.

Opting out

When we communicate with individuals about our fundraising events and charitable activities, we will allow the individual to request not to receive any similar communications and we will comply with that request by removing them from our mailing list.

Cross border disclosure of personal information

GCI may disclose the personal information of visitors and volunteers to GCO in order to facilitate their visit or volunteering activities. Visitors and volunteers will receive an email from us asking for their acknowledgement of this disclosure.

Government related identifiers

GCI does not adopt, use or disclose any government related identifiers of an individual, such as a Tax File Number.

Quality of personal information

GCI will take reasonable steps to ensure that the personal information it collects, uses and discloses is accurate, up to date and complete.

Where someone notifies us of changes to their personal details or of an error in our records, we will make the necessary changes as soon as possible and within no longer than 30 days.

Correction of personal information

If GCI holds personal information about an individual and either:

- we are satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading; or
- the individual requests us to correct the information,

we will correct that information to ensure that it is accurate, up to date, complete, relevant and not misleading. We will make the necessary changes as soon as possible and within no more than 30 days.

There is no charge for making a request or for correcting an individual's personal information.

Refusals

If we refuse to correct the personal information in the way requested by an individual (for example, if we are not satisfied of an error), the Privacy Manager will notify the individual, setting out reasons for the refusal (unless it would be unreasonable to do so) and providing an opportunity to object to the GCI Chair. The GCI Chair will respond to the objection within 30 days.

The individual may also request that we include a statement that the individual considers the information to be inaccurate, out of date, incomplete, irrelevant or misleading – in which case we will associate that statement with the information we have declined to correct. There is no charge for associating a statement with an individual's personal information.

Security and Access

Security of personal information

GCI will take reasonable steps to protect the personal information of an individual from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

This will include oversight of GCO in its use, disclosure and security of personal information that it holds.

Personal information held by GCI in Australia will be stored electronically on a secure database accessible only by Committee members, who have signed a code of conduct prohibiting the misuse of GCI information.

If GCI holds personal information about an individual that we no longer need and that we are not required to retain by or under an Australian law or court order, we will take reasonable steps to destroy or de-identify the information.

Access to personal information

Upon request from the relevant individual, GCI will provide the individual with a copy of their personal information held by GCI, unless:

- we reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual or to public health or safety;
- giving access would have an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings between GCI and the individual and would not be accessible to the individual by the discovery process in those proceedings;
- giving access would reveal GCI's intentions in relation to negotiations with the individual in such a way as to prejudice those negotiations;
- giving access would be unlawful;
- denying access is required or authorised by or under an Australian law or court order;
- we have reason to suspect that giving access would be likely to prejudice taking appropriate action in relation to an unlawful activity or misconduct of a serious nature relating to GCI's activities;
- giving access would be likely to prejudice one or more enforcement related activities conducted by or on behalf of an enforcement body; or
- giving access would reveal evaluative information generated within GCI in connection with a commercially sensitive decision-making process.

Requests for access can be made to the GCI Privacy Manager (using the contact details provided below), who will confirm receipt of the request within 5 business days and provide the information requested (or if necessary decline the request) within a reasonable period after all relevant GCI files and records have been reviewed.

We will give access to the information in the manner requested by the individual if it is reasonable and practical to do so.

Refusals

If we refuse the request we will provide the individual with a written notice setting out the reasons for refusal (unless, having regard to the grounds for refusal, it would not be reasonable to provide reasons) and allowing the individual make an objection to the refusal to the GCI Chair. The GCI Chair will respond to the objection within 30 days.

Complaints

GCI is committed to resolving any complaints related to privacy and personal information an individual may have. Queries and complaints can be sent to the GCI Privacy Manager using the contact details below:

GCI Privacy Manager

Email: enquiry@growingcambodia.org.au

Address: PO BOX 129 COWES 3922

Website: www.growingcambodia.org.au

We will try to answer any questions, correct any error on our part and resolve any complaint or concern about our information handling practices. However, if we do not resolve a complaint to an

individual's satisfaction, the individual has the right to complain to the Office of the Australian Information Commissioner (OAIC) using the contact details below:

Office of the Australian Information Commissioner

Email: enquiries@oaic.gov.au

GPO Box 5288

Sydney NSW 2001

Phone: 1300 363 992

Website: www.oaic.gov.au

Breach

If a GCI Committee member becomes aware of a suspected breach of this Privacy Policy, they should report the suspected breach to the Privacy Manager, who will promptly investigate and make a recommendation of any required action to the GCI Chair. The GCI Chair may, in his discretion, refer the matter to the GCI Committee for a decision about the required action.

An example of a privacy breach would be the erroneous disclosure of one donor's personal information in an email to another donor without their consent as this would be an unexpected disclosure of the individual's personal information and a possible failure to keep the individual's personal information secure.

Review of policy

This policy will be reviewed every two years to ensure it remains appropriate, or sooner if there is a significant change to Growing Cambodia's operations.

The review will be carried out by the Governance and Risk Sub-Committee members, who will make recommendations to the Committee for approval.

Document control information

Title	Privacy Policy		
Created by	Governance & Risk Sub Committee	Version	1.0
Authorised by	GCI Committee	Date	15 May 2024
Next Review	May 2026		

Appendix 1

Open and transparent management of personal information (APP 1)

GCI will be open and transparent about how we collect use and disseminate personal information.

Anonymity (APP 2)

General inquiries to GCI will not require the person making the enquiry to identify themselves.

Collection of solicited personal information (APP 3)

GCI will collect personal information in a fair and lawful manner.

Dealing with unsolicited personal information (APP 4)

GCI will return, de-identify or destroy personal information that it could not have fairly or lawfully collected.

Notification of the collection of personal information (APP 5)

GCI will notify individuals of the collection of their personal information by publishing a privacy collection statement on its website.

Use or disclosure of personal information (APP 6)

GCI will use and disclose personal information only for permitted purposes.

Direct marketing (APP 7)

GCI will not use or disclose personal information for the purpose of direct marketing unless permitted by the APPs.

Cross border disclosure of personal information (APP 8)

GCI will only disclose personal information to overseas recipients with prior authority of the individual concerned.

Adoption use or disclosure of government related identifiers (APP 9)

GCI will not adopt, use or disclose a government related identifier of an individual.

Quality of personal information (APP 10)

GCI will ensure, to the extent we can, that the personal information we collect, use and disclose is accurate, up to date and complete.

Security of personal information (APP 11)

GCI will take reasonable steps to protect the personal information we hold from unauthorised use or disclosure.

Access to personal information (APP 12)

GCI will, on request by the relevant individual, give the individual access to their personal information that we hold, except in limited permitted circumstances.

Correction of personal information (APP 13)

GCI will correct personal information it holds to ensure that, as far as is reasonably practical, the information is accurate, up to date, complete, relevant and not misleading.

Appendix 2

Privacy Collection Notice

Growing Cambodia Inc (GCI) is a registered charity with deductible gift recipient (DGR) status. Its purpose is to facilitate a self-sufficient and sustainable quality of life for rural Cambodians through education and enhancement of health and well-being.

GCI collects personal information for the primary purpose of funding and conducting our charitable activities and meeting our governance obligations. We will generally collect personal information about an individual from the individual concerned. However, Growing Cambodia Organization (GCO) in Cambodia may collect information about graduates of our supported schools who are applying for a tertiary sponsorship, on our behalf.

We only collect personal information that we need. For example, we need to collect personal information from:

- donors in order to solicit donations and provide them with tax deductible receipts and to communicate with them about our fundraising events and charitable activities
- other supporters in order to solicit prizes and gifts and communicate with them about our fundraising events and charitable activities
- fundraisers in order to inform them of their obligations when raising funds on behalf of GCI
- intending visitors and volunteers in order to facilitate their travel to, and volunteering activities at, our supported schools in Cambodia – in this instance personal information may be provided to GCO in Cambodia
- applicants for tertiary sponsorships in order to assess and approve their applications and maintain funding records
- members and committee members to comply with our governance obligations.

We also collect personal information about employees of GCO in order to communicate with them about the activities they perform on our behalf in Cambodia.

We use personal information to communicate with donors, supporters, fundraisers and intending visitors and volunteers. We do not publicly disclose personal information about individual donors, supporters and fundraisers without their consent.

If we are unable to collect and use personal information in the ways set out above, GCI's ability to raise funds and fulfil our charitable purposes would be greatly impaired. We would also be unable to meet our governance and legal responsibilities.

GCI has a Privacy Policy, which is available request.

For further information please contact:

The Privacy Manager
Growing Cambodia Inc
enquiry@growingcambodia.org.au
PO BOX 129 COWES 3922