

## Mahboba's Promise Privacy Policy

### 1. Introduction

The Management Committee of Mahboba's Promise Inc is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information constitutes information that directly or indirectly identifies a person.

Privacy is one of the three broad functions that have been conferred on the new Office of the Australian Information Commissioner (OAIC). The legislative basis of these privacy functions is drawn primarily from the Privacy Act 1988 (Cth).

In the development of this Policy, the Ten National Privacy Principles from Schedule 3 of the Privacy Act 1998 (Cth) have been adopted.

*Note:* Before 1 November 2010, the OAIC's privacy functions were carried out by the Office of the Privacy Commissioner. From 1 November 2010, the Privacy Act has continued to operate, and the position of Privacy Commissioner has continued, but the functions have been transferred to the OAIC.

### 2. Purpose

The purpose of this document is to provide a framework for Mahboba's Promise in dealing with privacy considerations.

### 3. Policy

Mahboba's Promise Inc collects and administers a range of personal information for the purposes of maintaining a donor database, raising funds, recruiting and working with staff and volunteers and implementing and monitoring projects overseas as well as complying with legislation. The organisation is committed to protecting the privacy of personal information it collects, holds and administers.

Mahboba's Promise recognises the essential right of individuals to have their information administered in ways which they would reasonably expect, protected on the one hand and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies.

Mahboba's Promise is bound by The Privacy Act 1988 and the NSW Privacy & Personal Information Protection Act 1998 alongside other laws, which impose specific obligations when handling information. The provisions of The Privacy Act 1988 as applied to the Private Sector have been distilled into Ten National Privacy Principles. Mahboba's Promise is also a member of ACFID and is bound by compliance with their Code of Conduct which includes privacy provisions.

In broad terms we:

- Collect only information which the organisation requires for a lawful function or activity.
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered.
- Use and disclose personal information only for a function or activity of the organisation, or for another purpose with the person's consent.
- Store personal information securely, protecting it from unauthorised access.
- Provide stakeholders with access to their own information, and the right to seek its correction.

**Mahboba's Promise adheres to the procedures outlined below.**

#### **4. Procedures**

##### **Collection**

Mahboba's Promise will:

- Only collect information that is necessary for the functions and activities of Mahboba's Promise Inc.

- Collect information only by lawful and fair means.
- Identify the organisation and give contact details.
- Notify stakeholders about Mahboba's Promise, why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Identify collectors with documentation to confirm whether they are volunteers, paid staff or agents of the organization.
- Inform donors and supporters of the purpose for which funds are being raised and provide access to information on the programs.
- Endeavour to only collect information about an individual from that individual.

## **Use and Disclosure**

Mahboba's Promise will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses we will obtain consent from the affected person.

## **Data Quality**

Mahboba's Promise will:

- Take reasonable steps to ensure the information collected is accurate, complete, up-to-date, and relevant to the functions we perform.

## **Data Security and Retention**

Mahboba's Promise will:

- Safeguard the information we collect and store against misuse, loss, unauthorised access and modification.
- Only destroy records in accordance with *Administration & Records Management Policy*.

- Take reasonable steps to prevent unauthorised use of data by contractors and IT service personnel who may have access to data for the purpose of conducting surveys, appeals or servicing equipment.

## **Privacy and Transparency**

Mahboba's Promise acknowledges that accountability, transparency and openness are standards of good governance that enhance public trust.

Mahboba's Promise will be open, accountable and transparent to its stakeholders with respect to the following information:

- The organisation's legal status, purpose and governance structure.
- Program and project information as they are developed.
- Press releases.
- The board approved policies and positions, when appropriate.
- Records of environmental impact on activities.
- Decisions made in board meetings that are not executive sessions, as recorded in meeting minutes.
- Public records as required by law.
- Financial information as reported and/or certified by an independent auditor.
- Other information may be determined by the board to be of importance to members and stakeholders.

Underpinning the abovementioned, Mahboba's Promise will:

- Ensure stakeholders are aware of Mahboba's Promise's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.
- Publicise the individual complaint process regarding breaches of privacy or request access to personal information, including contact information.
- Handle requests for information with fairness and transparency.

- Appoint a Privacy Officer to whom complaints can be directed for investigation.

## **Identifiers**

Mahboba's Promise will:

- Not adopt as its own identifier, an identifier of the individual that has been assigned by an agency or service provider acting for or on behalf of the Commonwealth.

## **Access, Correction and Opting Out**

Mahboba's Promise will:

- Ensure individuals have a right to seek access regarding information about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.
- Include "Opt-Out" Clauses on fundraising material regarding inclusion on mailing lists.
- Comply where a request is received from a person or organisation with a request that their name be deleted or suppressed from mailing lists.

## **Anonymity**

Mahboba's Promise will:

- Give stakeholders the option of not identifying themselves when completing evaluation forms or opinion surveys.

## **Making Information Available to Other Service Providers**

Mahboba's Promise:

- Can only release personal information about a person with that person's expressed permission. For personal information to be released, the person concerned must sign a release form.

- Can release information to third parties where it is requested by the person concerned.

## Training

Mahboba's Promise will take steps to make Management Committee, staff and volunteers familiar with the Privacy Policy:

- By inclusion of references to the policy in Management Committee, staff and volunteer induction literature.
- By inclusion of a Guideline on Privacy and Complaints procedure in the organisation's Policy Manual.
- Invitation to one training session per year with a focus on privacy policy, and complaints procedure.

## Responsibility

- The organisation's Management Committee is responsible for adopting this policy.
- The organisation's Management Committee, Privacy Officer and Executive Officer and all staff members, contractors and volunteers are responsible for the implementation of this policy.
- The organisation's Privacy Officer is responsible for investigating complaints relating to privacy.
- The organisation's Executive Officer is responsible for monitoring changes in Privacy legislation and for reviewing this policy as and when the need arises.

The following Privacy Policy Statement will appear on the association's website:

### Privacy Policy Statement

#### **Committed to protecting your rights**

Mahboba's Promise Inc. is committed to protecting your privacy. The Commonwealth Privacy Act 1988 governs us regarding the collection of personal information, whilst

adhering to the Ten National Privacy Principles from the Act. We are also members of the Australian Council for International Development, and we comply with its Code of Conduct.

## What information do we collect?

Mahboba's Promise Inc. typically requests the following information:

- Contact information (name, address, e-mail, telephone).
- Credit card numbers or bank account details for online donations.

All personal information is held under secure conditions with access restricted to those individuals who need it to carry out their work under Mahboba's Promise Inc. programs.

## How the information is used

We collect information to:

- Process donations and provide receipts.
- Maintain accurate details of our supporters' history with us.
- Keep our supporters informed of our work through newsletters and appeals.
- Respond to your comments and provide follow-up information.

We do not trade, sell or rent information we have collected about you to other organisation for marketing or any other purpose.

If you do not wish to receive appeals and/or newsletters, please let us know.

## Website

Mahboba's Promise Inc. collects web usage data like numbers and frequency of visitors, pages accessed, and files downloaded. This helps us determine how much our visitors use parts of the site; how many people visit on a regular basis and the usefulness of our pages. This information doesn't tell us anything about who you are or where you live, allowing Mahboba's Promise Inc to monitor the effectiveness of our website.

In some areas of the web site, links to other sites can be found. These sites are not controlled by Mahboba's Promise Inc. and therefore we cannot take responsibility for their content or privacy practices.



## Document Control

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