
Crawford Fund Privacy Policy

Approved by Board: 6 October 2020

Next review date: 30 June 2022

Managed on behalf of the CEO and Board by: Program Managers

*Revisions to this version are identified on the last page.

The Crawford Fund Limited (ACN 141 714 490) (the Fund) is committed to protecting the privacy of your personal information. This privacy policy explains how the Fund manages the personal information that we collect, use and disclose and how to contact us if you have any further queries about our management of your personal information. This privacy policy does not cover personal information collected or held by the Fund about its employees.

The Fund is required by the Privacy Act 1988 (Cth) (Privacy Act) to comply with the Australian Privacy Principles (APP) (subject to other provisions of the Privacy Act). The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection to use and disclosure, storage, accessibility and disposal. The Fund is also required to comply with the Spam Act 2003 (Cth) (Spam Act) and the Do Not Call Register Act 2006 (Cth) (Do Not Call Register Act).

1. What is personal information?

Personal information means 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.

Special provisions apply to the collection of personal information which is sensitive information. Sensitive information includes (for example) information about a person's membership of a professional or trade association. The Fund does not collect sensitive information (as defined by the Privacy Act) without consent.

The kinds of personal information the Fund collects and holds

Examples include:

- an individual's name, address, DOB, contact number and email address;
- post-nominal letters
- employment details
- credit card details
- membership of industry body

2. Collection of personal information by the Fund

To the extent required by the Privacy Act, the Fund will not collect personal information about you unless that information is necessary for one or more of our functions or activities, for example:

- conferences, meetings, events and presentations;
- newsletters or publications
- membership procedures

When the Fund collects personal information directly from you, we will take reasonable steps at or before the time of collection to ensure that you are aware of certain key matters, such as the purpose for which we are collecting the information, the organisations (or types of organisations) to which we would normally disclose information of that kind, the fact that you are able to access the information and how to contact us.

Where the Fund collects information about you from a third party, we will take reasonable steps to ensure that you have consented or have been made aware of the details as set out above.

Similarly, the Fund may be required to provide your contact details to third party suppliers of services which you would reasonably expect the Fund to do in order to provide its services. The Fund provides the opportunity to opt-out of such third-party arrangements.

The Fund acknowledges that there is no obligation for an individual to provide it with personal information. However, if an individual chooses not to provide the Fund with personal details, the Fund may not be able to provide the individual with the services reasonably expected to be provided.

3. Why does the Fund collect personal information?

The Fund collects personal information from you that is necessary for it to perform its functions. The types of personal information the Fund collects, and the purposes of collecting that information, include:

- Donors - when you make a donation, including via this website, in person, over the phone, by direct deposit, via email, by post, or through our fundraising personnel or volunteers as part of any of our fundraising events or activities or at our offices, the Fund collects and stores in our database your name, phone number, address, email address, date of birth, payment and billing details (including credit card details if relevant), and other contact information. We will use this information to process your donation, complete your tax receipt, send you further information about the Fund and for promotional purposes. The Fund engages third party service providers to process electronic payment of donations, store and manage your personal information and to contact you for fundraising purposes.
- Supporters and volunteers - the Fund may also collect its supporters' and volunteers' names, phone numbers, addresses, email addresses, and other contact information, records of communication between them and the Fund and other personal information about our current and potential supporters and volunteers so that we can encourage, record and acknowledge their support and communicate with them about the Fund and our activities.

- Distributing publications - we collect contact details (which may include name, phone number, address, email address, and other contact information) when individuals interact with us in order to distribute newsletters and other communications in print and electronic form from time to time. Recipients may choose to have their names and addresses removed from our distribution lists by contacting us.
- Conducting events – we collect contact details, donation history and other personal information, including photographs and videos, about donors, volunteers and other supporters who wish to join or participate in our events, programs we conduct and our publications. This information is used to administer these events, promote and seek support for such events, share individuals' stories with the community and for the activities of the Fund. With the consent of the relevant person.
- Assisting with your queries - you may choose to provide us with your name or other contact details when you call us by phone or write to us so that we can respond to your requests for our newsletter or for other information about the Fund.
- Conducting our general business activities - the Fund collects personal information about individuals who are, or are employed by, our suppliers (including service and content providers), contractors and agents for our general business operations.
- Applying for a position (as a volunteer or employee) with the Fund - we may collect your personal information, including name and contact details, information about your working history and relevant records checks (including criminal checks) when you apply for a position with us, in order for us to assess your suitability for that or other positions. With your consent, this information may include information or an opinion about your criminal record or other sensitive information.

Generally, we collect information directly from the relevant individual. Sometimes, we may need to collect information about an individual from third parties including other third party information sources. We will do this if the individual has consented for us to collect, use or disclose the information in this way, or where it is not reasonable or practical for us to collect this information directly from the individual.

Provision of your personal details is the most effective method for the Fund to communicate with you, and to assist in the efficient delivery of services.

From time to time, the Fund may survey its contacts on a range of issues. These surveys help us to identify and analyse the ongoing needs of our stakeholders and the quality of our products and services. If you do not wish to participate in these surveys, please let us know.

4. Use and disclosure of personal information by the Fund

If the Fund uses or discloses your personal information for a purpose (secondary purpose) other than the main reason for which it was originally collected (primary purpose) to the extent required by the Privacy Act, we will ensure that:

- The secondary purpose is related to the primary purpose and you would reasonably expect that the Fund would use or disclose your information in that way
- You have consented to the use and disclosure of your personal information for the secondary purpose
- The use or disclosure is required or authorised by or under law
- The use or disclosure is otherwise permitted by the Privacy Act

5. How might we contact you?

We may contact you in a variety of ways, including by post, email, SMS, social media, mobile devices or apps, telephone call or facsimile.

Spam

We will not send you any commercial electronic messages such as SMSs or emails unless this is permitted by the Spam Act. Any commercial electronic message that we send will identify the Fund as the sender and will include our contact details. This message will also provide an unsubscribe facility. If you do not wish to receive commercial electronic messages from us, please let us know.

Do Not Call Register

We will not call you on a number listed on the Do Not Call Register unless this is permitted under Do Not Call Register Act. If you do not wish us to call you on a particular number, please let us know.

Website or mobile device activity

The Fund system requires that the web browser accept cookies, which are used to make logging-in possible. These cookies are not used to collect, store, track or monitor any personal information. As would reasonably be expected, the Fund may collect website and mobile device (e.g. apps) statistics (which includes pages accessed and search terms used) but this information is not identifiable (i.e. the Fund cannot tell who you are).

6. When does the Fund disclose personal information to third parties?

In performing our functions and activities (such as for conferences, presentations, and events as outlined above), we may need to disclose personal information to third parties where you may reasonably expect the Fund to use or disclose the personal information for a specific purpose. Third parties with whom the Fund may share your personal information include, where appropriate:

- Printers and distributors of Fund publications and other material
- Financial institutions for payment processing
- External business advisers (such as auditors and lawyers)
- Travel and conference organisers.

7. Data quality and security

All personal information collected by the Fund will be retained as part of a database, which will be securely monitored and maintained by the Fund or an approved host, which to the best of our knowledge is based in Australia. If the Fund stores personal information with a “cloud” service provider, the provider may be situated outside Australia. Subject to paragraph 1.6, the data will not be made available to a third party, unless it is legally required and verified, without the authority of the individual who provided the personal information. The Fund will take all reasonable steps to protect the security of the personal information that it holds. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy. Where information held by the Fund is no longer required to be held, and the retention is not required by law, then the Fund will de-identify or destroy such personal information by a secure means.

8. Access and correction of your personal information

The Fund makes its Privacy Policy available on its website and can also provide a hard copy version upon request. If you would like more information or a hard copy of this Privacy Policy, please contact our Privacy Officer via the details provided below.

The Fund will make available for inspection, free of charge, all personal information, based on the information supplied by the individual that it holds in relation to an individual, provided reasonable notice is given. In the event that such a request is made, the Fund will review our records to determine what personal information is held and endeavour to respond to your request as soon as possible. Please note that the Fund will request that identification is provided before personal information is released. In the event that any part of the personal information that the individual inspects is determined to be incorrect and requires alteration then the Fund will make such alteration in compliance with the corrected advice provided by the individual.

In some circumstances, the Fund may not permit access to your personal information, or may refuse to correct your personal information, in which case we will provide you with reasons for this decision.

Further information

Please contact the Fund if you have any queries about the personal information that the Fund holds about or the way we handle that personal information. Contact details for privacy queries are outlined below.

Attention: Privacy Officer
The Crawford Fund Ltd
Building 7, Unit 7, 1 Dairy Road
Fyshwick ACT 2609

Email: crawford@crawfordfund.org
Telephone: 02 6280 8611

If you want to obtain additional information about your privacy rights and how you can enforce them, you can visit the website of the Office of the Australian Information Commissioner at: <http://www.oaic.gov.au/>

***Revisions to the Crawford Fund Privacy Policy**

Nature of proposed revisions	Date on which CEO endorsed	Date on which Board approved
Policy Initially approved	6 Oct 2020	6 Oct 2020

This Policy will be reviewed and adjusted, as required, by the CEO, staff and Board at least every two years.