

## **Australian Federation of Ukrainian Organisations Inc**

**ABN 40 104 855 692**

### **Privacy Policy**

#### **1.1 Purpose and Scope**

This Privacy Policy (the “Policy”) explains how we collect and handle Personal Information. The Policy complies with the Australian Privacy Principles (“APP”) to which it is bound, as set out within the Australian Privacy Act 1988 (Cth) (“Privacy Act”).

This Policy covers the following areas:

- Collection of Personal Information (including Sensitive Information)
- Use of Personal Information
- Security of Personal Information
- Storage of Personal Information outside of Australia
- Disclosure of Personal Information
- Website, Marketing and Applications Privacy
- Access to Personal Information
- Data Subject Rights (European Economic Area only)
- Our Privacy team contacts
- Effect of Policy

This Policy applies to all committee members, officers, volunteers, and employees of AFUO. All such personnel are required to comply with this Policy when dealing with Personal Information.

We take our privacy obligations seriously. Hence, we invite you to read this policy carefully and contact us if you have any questions. The Policy includes contact details under the privacy contact section.

#### **1.2 Personal Information**

We collect Personal Information with the primary purpose depending on why we initially collected your information. The primary purpose may be one or more of:

- to offer support to the people of Ukraine who are affected by the Russian-Ukrainian war; or
- to request support as a person of Ukraine who has been affected by the Russian-Ukrainian war; or
- to participate in activities relating to volunteering and providing humanitarian services.

“Personal Information” is defined in the Privacy Act 1988 (Cth) as information or an opinion about and identified individual, or an individual who is reasonably identifiable:

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

The main types of Personal Information we collect, sensitive or otherwise, may include:

- Names and contact details including phone numbers, postal and/or residential addresses and email addresses;
- Information that can identify you, including date of birth or residence status, drivers licence number, passport details, marital status, and photographs;
- Any facts or opinions that are connected to an enquiry pursuant to the primary purpose with which Personal Information was requested; and
- Other Personal Information such as skills, interests and preferences.

In some cases, you might need to give us Personal Information about other people – such as when you have an authorised representative. In those situations, we are relying on you to tell those people that you are giving us their details, and to let them know about this Policy. In addition, if you provide us with third party Personal Information then you warrant to us that you have the third party’s consent to do this.

By providing your Personal Information to us, you confirm that you have agreed to us collecting, using, and disclosing your Personal Information in accordance with this Privacy Policy.

With your permission, sometimes we may also need to collect Sensitive Information. Sensitive Information is a subset of Personal Information that is given a higher level of protection under the APP. Sensitive Information includes Personal Information about an individual's:

- Health (including predictive genetic information)
- Racial or ethnic origin
- Political opinions
- Membership of a political association, professional or trade association or trade union
- Religious beliefs or affiliations
- Philosophical beliefs
- Sexual orientation or practices
- Criminal record
- Biometric information that is to be used for certain purposes
- Biometric templates

The Personal Information (including Sensitive Information) collected or held by us will be referred to in this policy as “Personal Information”.

You may choose not to agree to provide the Personal Information we request. If you make that choice, then we may not be able to provide you with our assistance, or opportunities. Or we may not be able to engage with you or respond to your queries or request.

### **1.3 Method of Collection of Personal Information**

In most circumstances, we will collect Personal Information through voluntary questionnaires and forms that you have provided us. We also collect personal information through our websites and social networking services such as Facebook, Twitter and YouTube.

We collect Personal Information from people and organisations including:

- Volunteers
- Members
- Committee members
- Donors
- Employees
- Job applicants
- Third parties

If we receive Personal Information from third parties, we will protect it as set out in this policy.

We may also collect Personal Information when you visit our website including your location, IP address and your activity on our sites. This information helps us to keep connected with you through understanding use of our website. The information we collect may include information to enable us to personalise your experience on our website and to enable us to statistically monitor how you are using our website. We may also use this information:

- To conduct marketing and promotional efforts; or
- To provide information to your browser that we think may be of interest to you; or
- When you participate in programs or events that we run or support.

When we collect your Personal Information, we will provide you with more information about the reason for the collection. We may also tell you more about any other specific matters that are relevant to collecting that information.

### **1.4 Use of Personal Information**

We will only use your Personal Information for the purpose for which you have provided it, as permitted by this Privacy Policy, or otherwise consistently with the APP and Privacy Act. We will not disclose your Personal Information to third parties unless you have consented to such disclosure or in other circumstances where such disclosure is required or permitted by law.

If you have agreed, we collect and use Personal Information for one or more of several purposes. These will depend upon what is relevant to your situation:

- Contacting and communication with you;
- To enable us to help through our community programs;
- To provide humanitarian and emergency assistance.
- To manage our relationship with you, including confirming your identity, responding to any queries or requests, and contacting you for follow-up purposes;
- To enable us to raise funds – example: through direct fundraising, administering membership and bequests;
- To administer our international programs – example: when we deploy employees, contractors, or volunteers overseas.
- To analyse use of our products and services, and carry out quality assurance activities, including through working with third parties;
- To provide education and training, both internally and externally – example: to our volunteers, staff and other organisations;
- To keep you informed of our activities, including through sending out newsletters and electronic communications;
- To manage and develop our business and operational processes and systems;
- To manage and resolve any legal or commercial complaints or issues;
- To comply with our legal obligations; and
- To perform other functions and activities relating to our organisation.

If you do not provide us with the Personal Information we request, we may not be able to fulfil the applicable purpose of collection, such as to supply products or services to you.

If we collect, hold, or use Personal Information in ways other than as stated in this policy, we will ensure we do so pursuant to the requirement of the Privacy Act.

We retain Personal Information for as long as it is necessary to fulfil the purposes of Personal Information collection.

We respect the wishes of individuals who do not want to receive material from us in the future. You may ‘opt-out’ by emailing [communications@ozeukes.com](mailto:communications@ozeukes.com).

### **1.5 Security of Personal Information**

We endeavour to keep all Personal Information safe by taking all reasonable precautions to protect Personal Information from misuse, loss, unauthorised access, modification, or disclosure.

We will only keep your Personal Information for as long as we need it for the purposes described in this privacy policy. Your Personal Information will be destroyed or de-identified when it is no longer required.

We retain and safely store Personal Information that is provided to us. Personal Information is stored on our computer systems and within paper-based files where appropriate.

### **1.6 Storage of Personal Information Outside of Australia**

We do not generally transfer Personal Information to overseas parties unless required by law or enforcement activity or unless working with international service providers. There may be times when we store Personal Information with vendors who have been contracted to provide customer relationship systems and technological solutions. For example, we utilise international cloud computing services for e-mail storage and to store Personal Information that we collect. Countries in which such data may be stored may include (but are not limited to) the United Kingdom, Japan, Netherlands and the United States. Because the security of your Personal Information is of a paramount concern to us, we seek confirmation that such service providers comply with the Australian Privacy Principles or are subject to a binding law or scheme that offers substantially similar protection. Although information is encrypted where possible and efforts are made to protect your Personal Information, when you agree to this Policy you acknowledge that we will not be responsible for the overseas third party.

Any such disclosure or transfer of information does not change any of our commitments to safeguard your privacy and the information remains subject to existing confidentiality.

### **1.7 Disclosure of Personal Information**

#### We do not sell Personal Information.

Collected Personal Information will be used or disclosed only for a primary purpose for which it was collected unless consent for the use or disclosure is obtained from the person to whom the information relates.

We may disclose Personal Information in several circumstances including the following:

- for the purpose of providing information, products, services or marketing to you;
- to financial institutions in connection with receipts, invoicing and payments;
- to third parties, including agents, suppliers or sub-contractors, who assist us to conduct market research and development, including surveys, or in providing information, products, services, or direct mail or digital marketing. This may include parties located, or that store data, outside of Australia; and
- to third parties, including agents, suppliers or sub-contractors, who provide measurement, analytics and/or other business development services and who have been engaged to assist us to improve the effectiveness and distribution of business development and marketing activities.
- to third parties where you consent to the use or disclosure; and

- where required or authorised by law

### **1.8 Access to Personal Information**

Information may be accessed by our personnel and volunteers. All personnel and volunteers must comply with the Australian Privacy Principles.

Subject to any exceptions in the Privacy Act, you have a right to request access to your Personal Information held by us and to request the correction of such information.

If we accept a request for correction, we will correct our records containing Personal Information within a reasonable period after the request of the individual is received. We will endeavour to correct any information that is inaccurate, outdated, incomplete, irrelevant or misleading and will advise any third parties we have disclosed the information to about the amended provided it is reasonably practicable to do so.

If you want to lodge a request to access and/or correct your Personal Information you should do so by contacting our Privacy Officer through the contact information given below:

P.O. Box 251, Essendon, Victoria, 3040, Australia

Tel: +61 3 9375 1781

Email: [communications@ozeukes.com](mailto:communications@ozeukes.com)

To protect your Personal Information, we may require identification from you before releasing the requested information.

We will not normally charge a fee for processing an access request unless the request is complex or is intensive, in which case we may charge a reasonable fee to defray the access costs.

### **1.9 Website, Marketing, and Applications Privacy**

This Policy also applies to any Personal Information we collect via our website, in addition to Personal Information you provide directly.

For statistical and analytical purposes, we collect information on website activity (such as the number of users who visit our website, the date and time of visits, the number of pages viewed and location). This information provides us with statistics that can be used to analyse and improve our website and services. We also analyse the traffic through our website, which may involve the use of cookies for marketing and market research more generally.

We may also use web beacons on our websites from time to time. Web beacons or clear. gifs are small pieces of code placed on a web page to monitor the visitors' behaviour and collect data

about the visitors viewing a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

We do not use this technology to access your Personal Information.

Our website may contain links to other websites of interest. We do not have any control over those third-party websites. We are not responsible for or liable for the protection and privacy of any information which you provide whilst visiting such third-party websites, and such third-party websites are not governed by this policy.

### **1.10 Correction to Personal Information**

From time to time, we may take steps to verify information by collecting information from publicly available resources, for example, telephone directories or electoral rolls to improve the integrity of the information that we hold.

We provide a transparent system of allowing individuals to access their information and seek corrections to any inaccuracies. Requests for access and correction to information should be made by contacting our Privacy Officer using the contact details at the end of this policy.

In certain circumstances, we are permitted to deny the request for access, or limit the access that we provide.

If you believe that the Personal Information we hold about you is incorrect or out of date, or if you have concerns about how we are handling your Personal Information, please contact us and we will try to resolve those concerns.

If you wish to have your Personal Information deleted, please let us know and we will take reasonable steps to delete it.

If we become aware of any concerns or problems concerning our privacy practices, we will take these issues seriously and work to address any concerns. If you have any further queries relating to this policy, or you have a problem or complaint, please contact our Privacy Officer.

If you are not satisfied with our handling of your problem or complaint you may make a complaint to the Australian Information Commissioner.

### **1.11 Data Subject Rights (European Economic Area Only)**

If you are in the European Economic Area (EEA) you have the following rights in relation to your personal data (as that term is defined in the General Data Protection Regulation):

- **Access.** Subject to certain exceptions, you have the right to request a copy of the personal data we are processing about you, which we will provide to you in electronic form. At our discretion we may require you to prove your identity before providing the requested

information. If you require multiple copies of your personal data, we may charge a reasonable administration fee.

- **Rectification.** You have the right to require that any incomplete or inaccurate personal data that we process about you is amended.
- **Deletion.** You have the right to request that we delete personal data that we process about you, unless we are required to retain such data to comply with a legal obligation or to establish, exercise or defend legal claims.
- **Restriction.** You have the right to request that we restrict our processing of your personal data where:
  - o you believe such data to be inaccurate.
  - o our processing is unlawful; or
  - o we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not want us to delete it.
- **Portability.** You have the right to request that we transmit the personal data we hold in respect of you to another data controller, where this is:
  - o Personal Information which you have provided to us; and
  - o we are processing that data on the basis of your consent or in order to perform our obligations under contract to you (such as to provide legal services).
- **Objection.** Where the legal justification for our processing of your personal data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.
- **Withdrawing Consent.** If you have consented to our processing of your personal data, you have the right to withdraw your consent at any time, free of charge. This includes cases where you wish to opt out from marketing messages that you receive from us.

If you are in the EEA, you also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws.

## 1.12 Amendments

This Policy may be amended, including with changes, additions and deletions, from time to time in our sole discretion and any such amendments will be notified to you by posting an updated version of the Policy on our website. If at any point we decide to use Personal Information in a manner materially different from that stated at the time it was collected we will notify relevant persons by email or via a prominent notice on our website, and where necessary, we will seek the prior consent of the relevant persons.

### 1.13 Privacy Contact

For privacy related matters please contact us:

P.O. Box 251, Essendon, Victoria, 3040, Australia

Tel: +61 3 9375 1781

Email: [communications@ozeukes.com](mailto:communications@ozeukes.com)

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Responsible person	K. Argyrou	Scheduled review date	July 2023

**Compliance with this policy**

If the board has a reason to believe that a person subject to the policy has failed to comply with it, it will investigate the circumstances.

If it is found that this person has breached this policy, the board may take action against them. This may include seeking to terminate their relationship with the AFUO.

I have read and understood the AFUO Privacy Policy

**Name:**

**Signature:**

**Date:**

I have attended the AFUO Privacy Policy induction webinar

**Name:**

**Signature:**

**Date:**