**Purpose**

This policy sets out how the Seton Villa (we) will handle (collect, use, store and disclose)

personal information in accordance with the National Privacy Principles under the

Australian Privacy Act 1988 (Privacy law) and the Privacy Amendment (Enhancing

Privacy Protection) Act 2012. It describes how we will do this in the context of raising funds to support the work of Seton Villa in actively supporting our residents to enrich their lives.

You can find out more about the National Privacy Principles by calling the Office of the

Information Commissioner on 1300 363 992 or through their website

at [www.oaic.gov.au](http://www.oaic.gov.au)

**Policy**

Seton Villa is committed to protecting your privacy and we are bound by the Australian

Privacy Principles in the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

We collect, store and use some of your personal information so that we can actively support people living with disabilities. Only authorised staff have access to your personal

information: it remains confidential and is only used for appropriate purposes and in

accordance with this policy.

Unless you give us consent to do otherwise, we will only collect and use your personal

information as set out below. Personal information collected by Seton Villa may include:

• your identification and contact information – name, address, email address,

 phone number, mobile phone number

• your date of birth, gender, income, occupation

• your donation and payment details

• where relevant, your employer details (for example if you participate in

 workplace giving)

• a history of your transactions, correspondences and interactions with Seton

 Villa

• if relevant, details about your personal interests.

*Please note*: if you choose not to provide us with certain personal information, we may not be able to process your donation or provide the information you request. You always have the right to request us to remove your details from our database or reduce the volume of correspondence you receive from us.

**How we collect information**

There are a number of ways we collect information from you. These may include:

• directly from you when you provide information by phone, in person, via our website, or

 response forms

• from our own records of your transactions and interaction with Seton Villa

• from publicly available sources of information

• from third parties who organise fundraising activities on our behalf. These

 parties are also bound by the Australian Privacy Principles.

• from a third party known to you who donates and nominates you as the recipient of

 communication regarding that donation

• in forms or coupons filled out either online or in hard copy

• face to face or when you speak with us directly

• via email

• via online surveys

• via social media messages or conversations

• in voice or image recordings.

**How we use your information**

Your personal information may be used:

• for the immediate reason for which you have given it: for example, to enable us

 to process your request (eg gift, payment, registration, subscription, event, change of details)

 including issuing you with a donation receipt

• to maintain contact with you about our work: report back to you about the work at Seton

 Villa; encourage you to learn about and act on supporting Seton Villa; or let you know about

 other opportunities to give financially.

• to confirm your identity when you make enquiries about your donation

• to address any feedback or complaints you may have and to answer your

 queries

• for any other purpose related to our work.

It may also be used for:

• any purposes for which the information was requested

• purposes directly related to the above purposes.

Your information will not be used for any purpose to which you would not reasonably expect us to use the information provided; and most importantly, we don’t rent or sell your personal information.

In order to communicate with you in relation to the activities of Seton Villa, we may disclose your personal information to external organisations to help facilitate our correspondence and fundraising activities with you.

We care for, and value the security of your personal information. We will take all reasonable steps to ensure any external organisations we use are contractually bound to privacy and confidentiality obligations in relation to your personal information and that it is only used for the specific purpose for which we disclose it. These organisations are also bound to adhere to the privacy requirements under the relevant legislation and are bound to destroy or de-identify information after using it for a specific activity.

**Information disclosure**.

In addition to the external organisations which help facilitate our correspondence and

fundraising activities with you, we may disclose your personal information to:

• an authorised legal representative nominated by you

• our accountants, auditors and lawyers

• government authorities if legally required to do so.

**How long do we keep your information?**

We will keep and use your information after you have provided a donation or

interacted in some other way with Seton Villa. How long we hold and use the

information after you have ceased donating or interacting with us will depend on the

type of interaction you had with Seton Villa and any requirements under law.

It is also our policy to:

• permanently de-identify personal information where reasonable and possible

• destroy personal information once there is no longer a legal or business need

for us to retain it.

**Protecting information provided via the Internet**

Our site uses security encrypted response forms when personal and financial details are requested. These forms are subject to compliance requirements with Payment Card Industry Data Security Standards (PCI-DSS) as well as the privacy principles.

However, it should be noted that no data transmission over the internet can be guaranteed as 100% secure, so we cannot give an absolute assurance that the information you provide to us

over the internet will be secure at all times until it is received into our database. Seton Villa cannot be held responsible for events arising from unauthorised access to your personal information via the web.

**Links to other websites**

We may provide links to websites outside of Seton Villa. These linked sites are not under the control of Seton Villa, and we are not responsible for the conduct of companies linked to our website. Before disclosing your personal information on any other website, we advise you to examine the Terms and Conditions of those websites.

**Online advertising and tracking**

We use third-party tracking cookies and similar technologies to collect and use data about user activities on our sites. The third-party vendors, such as Facebook and Google, whose services we use place these cookies and similar technologies on web browsers in order to help us tailor advertising that we think may be of interest to users based on past visits to our site.

As always, we respect your privacy and are not collecting any identifiable information through these services. Cookies and similar technologies do not in any way give access to your computer. To no longer have your visits to our site tracked for advertising purposes, you can opt-out of ad customisation through the use of cookies and similar technologies using the Digital Advertising Alliance Consumer Choice opt-out tool. We also use similar technology to track the performance of our website and user activity in order to improve the experience on our site. You can opt out of the tracking services we use by following these links:

• Google Analytics: download a browser-based add-on

• HotJar

**Storage and security of your personal information**

Seton Villa will endeavour to take all reasonable steps to keep secure any information which we hold about you (whether electronic or in hard copy), and to keep this information accurate and up to date. This includes complying with the Payment Card Industry Data Security Standard, which covers security of payment card information. Your information is stored on secure servers that are protected in controlled facilities. We require our employees and data processors to respect the confidentiality of any personal information held by us and that they abide by our confidentiality policy and procedures.

**Right of access to your information**

If at any time you want to know exactly what personal information we hold about you,

you are welcome to contact us. Our file of your personal information will be made available to you within 21 days. Requests for right of access should be addressed to the Seton Villa CEO.

**Reducing communications, opting out or modifying your information**

You may wish to change personal information that is inaccurate or out of date. If you

wish to do so, or if you want to change any information that you have previously provided to us, or if you want to reduce, or opt out of future communications, you can contact Seton Villa via contact details published on our website.

**Enquiries, feedback or complaints**

If you believe that the 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 seek to resolve those concerns. If you wish to have your personal information deleted, please contact us and we will take reasonable steps to delete it unless we need to keep it for legal, auditing or internal risk management reasons.

If we become aware of any ongoing concerns or problems concerning our privacy

practices, we will take these issues seriously and work to address these concerns. If you

have any further queries relating to our privacy policy, or you have a problem or

complaint, please contact us, addressing your question or concern to the Seton Villa CEO.

**Changes to this Privacy Policy**

We may make changes to this policy from time to time without notice. Any changes will

be reflected on this page.

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| Approved By:Seton Villa Board | Date Approved:7 April 2021 |
| Date Reviewed: | Date Amended: |
| NDIS Practice Standard:2 – Provider Governance and Operational Management |