

This Data Protection Policy sets out the approach that Dana Asia (the Organisation) takes in relation to the treatment of personal information. It includes information on how the Organisation collects, uses, discloses, and keeps secure individuals' personal information and how you can access your personal information.

This policy has been drafted having regard to the Organisation's obligations under the Australian Privacy Act 1988 and all amendments to the Act and the Australian Privacy Principles. The policy also recognises the Organisation's commitment to comply with the Payment Card Industry Security Standards when managing donations provided by payment cards.

The Organisation will only collect personal information where that information is necessary for the Organisation to perform one or more of its functions or activities.

What information is collected?

Only personal information will be collected that is necessary for the organisation to carry out business relationships and will only be collected with consent. Personal information is information on an individual whether or not it is true and whether or not the information is recorded. Information will only be collected by lawful and fair means.

Personal information may include information that identifies the person, such as:

- o Name, address, contact details (phone number, email address)
- o Date of birth
- o Place of work
- o Occupation
- o Photos & Videos
- o Bank account and/or credit card details
- o Employer's details if the person participates in workplace giving.
- o Donation history, emails, letters, and other interactions with the Organisation
- o Medical records
- o Identification
- o Information regarding their opinions.
- o Details the person may choose to provide about their values, interests, and beliefs.

The Organisation will endeavour to ensure that all information is accurate, up-to-date, and complete.

The Organisation will only collect sensitive information if it is reasonably necessary to carry out business relationships and will only be collected with consent of the person.

The Organisation will only collect information from the individual unless the individual consents to the collection from someone else, collection is a legal/regulatory requirement, or it is unreasonable or impracticable to collect the information from the individual. If the Organisation collects personal information from someone other than the person or the person is unaware that personal information has been provided, the Organisation will endeavour to inform the person as soon as practicable.

The person may choose not to identify themselves or use a pseudonym when dealing with the Organisation except when any financial transaction takes place at which time the Organisation will adhere to its requirements under its Anti-Money Laundering and Counter-Terrorism Financing Policies regarding identification of all clients.

How will the information be used?

The Organisation will always disclose why the organisation is collecting this information when it is requested. The Organisation will not use or disclose information for any other purpose unless the person consents or the Organisation is required to do so by law, and if so the organisation will communicate the circumstances for the release as soon as practicable and in line with any legal requirements.

The Organisation may use the information to:

- o check whether the person is eligible for the service they are enquiring about;
- o provide the person with the product or service;
- o help manage the product or service, for instance;
- o when the person makes a query about it;
- o when the organisation wants to contact the person about changes to it.

The Organisation may use personal information for other reasons, including:

- o telling the person about services or events that the organisation thinks may interest them.
- o preventing fraud and other criminal activity in relation to the person's accounts
- o helping the organisation to run its business.

This will include using information for:

- o accounting, risk management, record keeping, archiving, systems development and testing
- o developing new products and services
- o undertaking planning, research, and statistical analysis.

The Organisation may also ask for personal information because the organisation is required to collect it for legal reasons.

How the information is collected

The Organisation collects information provided over the phone, in correspondence, in person, via the organisation's website and related social media platforms, or in response to the organisation's fundraising activities.

The Organisation also collects information from partner organisations who fundraise for/with the organisation or organise workplace giving.

If the Organisation gathers information that an individual may not be aware it holds, the Organisation will ensure the individual is aware of the collection of their data as soon as practicable.

Will the information be shared?

The Organisation does not rent, swap, or sell details to any other organisation without consent. However, the organisation may have to disclose some of this information with some other parties:

- o Banks
- o Accountants, auditors, or lawyers
- o Credit providers, in order to authorise the person's payments;
- o Authorised legal representative nominated by the person;
- o Law enforcement, government, or other organisations, as required by law.

The Organisation aims to limit the information given to these organisations to what they need to perform their services for the organisation or provide services to the person.

The Organisation will not release information to any overseas recipient without the person's written consent, unless required to by law, and if so, the organisation will communicate the circumstances for the release as soon as practicable and in line with any legal requirements. If information is released overseas, the Organisation will take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles or the Organisation's Privacy Policy.

Can personal information be accessed?

The Organisation endeavours to ensure information is managed in an open and transparent way. A person can always ask to access the personal information free of charge and the requested information will be provided in a timely fashion. A person can do this by contacting the Organisation's head office. A person can ask to have their information updated if some of the details have changed.

The Organisation may not be able to grant access to all the personal information collected. The Organisation will clarify the grounds for refusal with regard to any legal requirements regarding release of information.

The Organisation may not be able to grant access to information that includes the following:

- reveal personal information about another person;
- reveal a commercially sensitive decision-making process;
- pose a serious threat to the life, health or safety of any individual, or to public health or safety;
- the information relates to existing or anticipated legal proceedings or denying access is required by law giving access would be unlawful .

Security of personal information

The Organisation understands the importance of keeping personal information safe and secure. Personal information is only accessed by personnel that need it to carry out their job in relation to the service requested.

All information, whether hard or soft copy, is stored in locked or password protected environments, to ensure that personal information is stored securely, including any sensitive information we may obtain.

The Organisation complies with the International Payment Card Industry (PCI) Security Standards requirements to protect payment card information collected and stored for donation purposes. The Organisation's online donation platform is linked to a PCI certified payment system with comprehensive security and encryption.

How long will information be kept?

The Organisation will destroy or de-identify personal information when it is no longer needed for the purpose for which it was collected unless the law requires otherwise.

How unsolicited information is dealt with.

If the Organisation receives unsolicited personal information, the organisation will assess whether it could have collected the information under the Privacy Principles and if not the organisation will either destroy the information or ensure it is de-identified provided it is lawful and reasonable to do so.

NEW PRIVACY AND PERSONAL INFORMATION PROTECTION AMENDMENT ACT (The PPIP Amendment Act)

The new law which will come into force in December 2023 introduces a mandatory breach notification scheme: organisations must notify the OAIC and affected individuals if serious harm can occur from breach.

The Organisation needs to be more transparent about policies regarding information/ data and must publish data breach policies.

The Organisation has a public data breach response plan to enable it to respond quickly to a data breach.

The Organisation has an internal register to record any eligible data breach breaches that contain personal info. Records all of data breaches, details of the notification process, type of breach, mitigation measures, overall estimated cost of the breach.)

Dana Asia takes all reasonable steps to complete the assessment within 30 calendar days after the day the organisation becomes aware of the grounds or information that caused it to suspect an eligible data breach.

Contact us

Any further queries about how personal information is collected, used and stored, or to change or update personal information, please do not hesitate to contact the Organisation at admin@danaasia.org.

The Organisation maintains a Data Breach Register, Complaints Policy and Procedure that may be used by any person to raise a suspected breach of its Policies including the Data Protection Policy. The Complaints form & Data Breach Register are made available on the Organisation's website www.danaasia.org.

Review and Evaluation

The Board is responsible for oversight of this policy. All board members and staff members, volunteer and contract staff are responsible for adhering to this policy.

Senior Management will undertake regular review of this policy in line with The Organisation's organisational capacity, the policy purpose stated, and within the framework of the Organisation's commitment to quality assurance and continuous improvement. The updated policy will require formal Board approval and will be communicated to all staff for review and re-signing if applicable.

DISCLAIMER:

Dana Asia does not provide financial advice. Independent financial advice should be sought. The Organisation has used its best endeavours that the information provided is correct. Errors and omissions excepted.