

## Nusatenggara Association, Inc.

### Privacy Policy

v1.0 July 2018

#### Preamble

The mission of the Nusatenggara Association, Inc (NTA) is to alleviate the worst poverty in the province of Nusa Tenggara Timur, Indonesia. The NTA sponsors economic and social development activities selected by our sponsored communities, ranging from building water tanks and wells, through providing farming equipment and training to local farmers, to supplying books for schools and training local teachers. We employ and provide training to over twenty Indonesian staff in West Timor and Flores. In the past decades, Indonesia has suffered severe terrorist attacks and faced major terrorism challenges.

#### Overview

This Privacy Policy (Policy) explains how NTA and its related entities collect and handles your Personal Information.

NTA is committed to protecting your privacy. Establishing a trusting relationship with our members, sponsors, volunteers, partners and other stakeholders, is central to our work practices.

Privacy Legislation means, as applicable, the *Privacy Act 1988 (Cth)* or any legislation that replaces this Act. We take our obligations under the Privacy Legislation very seriously.

In this Policy, Personal Information has the same meaning as in the Privacy Legislation. (That is, it 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.)

This Policy applies to all enterprises and online services operated by NTA, through the website and associated subdomains: [www.nta.org.au](http://www.nta.org.au)

We apply this Policy to all individuals and entities who interact with NTA. This includes (but is not limited to) agents, contractors, subcontractors, employees, representatives, users of NTA's services, and volunteers.

We may update this Policy from time to time in accordance with legislative or operational changes. If you would like us to send you a free copy or you have comments or questions regarding this Policy, please contact us using the details provided below.

#### Types of information we collect

The type of information that we collect, and hold depends on the nature of a person's involvement with us.

We only collect your Personal Information where it is reasonably necessary for us to pursue one or more of our functions or activities, or where the law requires us to collect it.

Depending on the reason for collecting it, the Personal Information we collect may include (but is not limited to):

1. your name and contact details;
2. copies of identification documentation;
3. payment information and banking details if you are purchasing a product through us;
4. Personal Information contained in forms or applications;

5. Personal Information contained in queries, or feedback about our services;
6. usage data (which may include your IP address, the pages you have clicked through on our websites, websites that referred you to our sites, information about the device you are using, and your wider geographic location).

In some circumstances, we collect Sensitive Information which requires a higher level of protection under the Privacy Legislation. We consciously limit how much Sensitive Information we collect, and we only collect it when we have your consent and the collection is reasonably necessary for us to pursue one or more of our functions or activities. For these purposes, 'Sensitive Information' means:

1. Information or an opinion about an individual's:
  - a. Racial or ethnic origin;
  - b. Political opinions;
  - c. Membership of a political association;
  - d. Religious beliefs or affiliations;
  - e. Philosophical beliefs;
  - f. Membership of a professional or trade association; Membership of a trade union;
  - g. Sexual orientation or practices; and
  - h. Criminal record.
2. Health information about an individual,
3. Genetic information about an individual that is not otherwise health information; and
4. Biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or biometric templates.

### **How we collect information**

We ask you for Personal Information when it is reasonably necessary for the activities in which you are seeking to be involved.

We will only collect your Personal Information by lawful and fair means, including by telephone, by letter, by email, or through forms on our websites.

Normally, we collect your Personal Information directly from you (or the relevant individual), unless it is unreasonable or impracticable to do so.

We may:

1. Collect Personal Information from agents, contractors, subcontractors, employees, representatives, users of NTA's services, and volunteers.
2. On occasion, collect Personal Information from a third party. For example, Personal Information may be provided by third party websites (refer to clause 8).
3. Collect user data through log files and cookies. You can block or delete cookies and still use our services, although if you do, you will be asked for your email address and password every time you log into an account you hold with us.

We generally obtain consent from the owner of Personal Information to collect their Personal Information. Consent may be provided in writing, or may be provided orally, or may be implied through a person's conduct.

You are not required to provide the Personal Information and/or Sensitive Information we request. However, if you choose not to provide it, we may not be able to service your needs.

You are free to browse our websites anonymously. However, when you are registering for one of our services, we require you to register an account using your name or a pseudonym and provide a valid

email address. It is impractical for us to manage and provide support if we cannot match you to your account. Receipts (especially tax-deductible receipts) may be invalid unless accurate information, including your real name, is provided.

### **How we deal with unsolicited Personal Information**

This clause sets out what happens if we receive your Personal Information from you or a third party without having asked for it.

First, within a reasonable time, we determine whether the Personal Information is reasonably necessary for, or directly related to, our functions or activities.

Then, if we determine the information is not reasonably necessary for these purposes, as soon as practicable we either destroy the information or ensure that it is de-identified, so long as it is lawful and reasonable to do so.

### **How we use your Personal Information**

We use your Personal Information for a range of purposes, including:

1. Providing you with our services;
2. Improving our services through quality-improvement activities;
3. Providing information, news, offers and conducting surveys;
4. Helping you to access the most appropriate information and tools associated with our websites;
5. Providing you with support if you need technical assistance;
6. Processing payments, including donations;
7. Communicating important service-related announcements, changes to our services or policies, or password reminders;
8. Providing you with information about your account and newsletters you have signed up to receive;
9. Answering queries and resolving complaints;
10. Complying with directions from authorities or legislative requirements;
11. Screening for or preventing potentially illegal or abusive activity.

We may also collect, hold, use and disclose Personal Information for purposes:

1. Which we explained at the time of collection; or
2. Which are permitted by law; or
3. Which you have provided your consent; or
4. Which are necessary for maintaining the reliability and security of infrastructure and services.

We only use or disclose your Personal Information for the above purposes, or for purposes that you consent to, or for other related purposes that you would reasonably anticipate.

To the extent you submit content to public areas of our websites (for example, on an online forum), it will be available to the public and we may reuse or republish it.

If you have any concerns about us using your Personal Information in any of these ways, please notify us immediately.

## **How we store and handle your data**

We hold Personal Information in a number of ways, including in electronic databases, email contact lists, and in paper files held in secure drawers and cabinets.

We take reasonable steps to:

1. Make sure that the Personal Information is accurate, up to date and complete, and (in the case of use and disclosure) relevant;
2. Protect the Personal Information from misuse, interference and loss, and from unauthorised access, destruction, use, modification or disclosure;
3. Destroy or permanently de-identify Personal Information that is no longer needed for any purpose for which it may be used or disclosed under this Policy. (However, we may keep information for a longer period where necessary to comply with contractual, regulatory or legal requirements.)

Any Personal Information we provide to you through your online account(s) with NTA is password-protected.

1. You must not reveal or share your password with anyone.
2. We will never ask for your password, either verbally or through phone or email contact (whether initiated by you or us).

## **Accessing and correcting your Personal Information**

If you would like to access your Personal Information, you can request to do so using the contact details below. We will allow you to access your Personal Information unless there is a sound reason not to, including where:

1. Giving access would have an unreasonable impact on the privacy of others; or
2. We consider that your request for access is frivolous or vexatious.

If we refuse to give you access to your information, we will give you a notice setting out our reasons.

If you believe that information we hold about you is incorrect or out of date, please contact us via email and we will take all reasonable steps to amend the information in line with your request.

## **Third party service providers**

NTA uses some third-party service providers in order to support our websites and operations. These third-party service providers may store information inside or outside Australia.

We select reputable third-party service providers on the basis of their published privacy policies. We do our best to ensure that third party service providers do not breach the Privacy Legislation. A list of third party service providers can be requested using the contact details below.

## **Direct marketing**

We only use your Personal Information to let you know about our products or services where we have your consent, or where we are otherwise permitted by law to do so. We may contact you for these purposes in a variety of ways, including by mail, email, SMS or telephone.

We do not sell your Personal Information to any third party for the purposes of direct marketing.

Where you have consented to receiving marketing communications from us, your consent remains current until you advise us otherwise. You can opt out at any time, by:

1. Contacting us as set out below;
2. Advising us if you receive a marketing call that you no longer wish to receive; or
3. Using the unsubscribe facility that we include in our commercial electronic messages (such as emails and SMS) to opt out of receiving messages.

We do not use your Sensitive Information for the purposes of direct marketing.

### **Notification of a data breach**

If we become aware of unauthorised access to or loss of your Personal Information, we will promptly:

1. Notify you;
2. Investigate the cause;
3. Do our best to remedy any consequences; and
4. Tell you what steps we have taken to prevent a reoccurrence.

### **Complaints**

If you have a complaint about how we collect or handle your Personal Information, please contact us using the contact details below. We treat any claims of privacy breaches seriously and will do our best to respond to your complaint within seven days of receiving it.

If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commissioner.

### **How you can contact us**

Please contact us if you have any queries about the Personal Information that we hold about you or the way we handle it. Our contact details are set out below:

1. Call us on (+61) 02 6251 2507
2. Email us on [enquiries@nta.org.au](mailto:enquiries@nta.org.au)
3. Send a letter to us at:

Attention: Privacy Officer  
Nusatenggara Association Inc.  
PO Box 677  
Jamison Centre ACT 2614

### **Reviewing this policy**

This policy will be reviewed annually to assess its effectiveness, appropriateness and accuracy.

### **Version control**

<b>Version</b>	<b>Date</b>	<b>Approved by Board</b>	<b>Details</b>
1.0	31 July 2018	31 July 2018	New Policy to meet ACFID Code of Conduct Compliance requirements.