



PRIVACY POLICY

1. Purpose

The purpose of this Privacy Policy ("Policy") is to promote the open and transparent management of personal information by AdSAFE Ltd (ABN 61 615 376 997) ("AdSAFE").

2. What is personal information?

The *Privacy Act 1988* (Cth) (Privacy Act) defines "personal information" as 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 material form or not.

Personal information includes 'sensitive information', which is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.





We may use your personal information for the purposes identified in Section 5 below (primary purpose) and for other purposes (secondary purposes) if:

- you consent to the use or disclosure of the information;
- you would reasonable expect us to use or disclose the information for the secondary purpose, which is:
 - in the case of sensitive information – directly related to the primary purpose; or
 - in the case personal information – related to the primary purpose; or
- the use or disclosure of the information is required by law;
- a permitted general situation exists in relation to the use or disclosure by us;
- a permitted health situation exists in relation to the use or disclosure of the information; or
- we reasonable believe that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities.

3. What information do we collect?

The kinds of personal information that we collect from you will depend on how and why you use AdSAFE's services. The personal information which we collect and hold about you may include:

- your email addresses;
- your address;
- your telephone number;
- your date of birth;
- your gender;
- your employment information;
- your bank account details;
- information relating to child protection checks relating to you;
- information about roles you have been appointed to in a church;
- information about training you have completed and Codes of Conduct you may have signed;
- your criminal record history;
- information about your health and medical records;

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AdSAFE Ltd  ABN 61 615 376 997  AdSAFE is a service of the Seventh-day Adventist Church (South Pacific Division)

- your religious beliefs or affiliations;
- case files relating to allegations and any resulting investigation relating to you;
- case files for victims / survivors;
- your racial or ethnic origin;
- case files for managing the safe attendance and participation in church services and activities for known offenders; and
- case files relating to applications for redress;

4. How we collect your personal information

We may collect personal information from you:

- in person;
- when you input your personal information into our website or online forms;
- by telephone;
- by post;
- by email correspondence;
- from third parties, including churches, administrative offices, other affiliated entities such as schools and other church groups.

We also collect cookies from your computer, which may inform us as to when and how you access our website. As a general rule, however, it is not possible to identify you personally from our use of cookies.

We also collect information from third parties, including:

- reports provided by medical professionals and psychologists;
- information from child protection agencies and community support organisations;
- information from government child protection services;
- information from helpline contacts relating to allegations of sexual and physical abuse of children and vulnerable persons;
- information from local schools and other Church groups; and
- service providers.

5. Purpose of collection

AdSAFE is a entity providing services for the protection of children and vulnerable persons in the Seventh-day Adventist Church and any of its affiliated entities (Church Setting) in the South Pacific Division. AdSAFE is responsible for implementing prevention strategies to mitigate the risk of sexual and physical abuse against children and vulnerable persons and respond when allegations of abuse are raised (AdSAFE Services).

AdSAFE may collect the personal information listed in Section 3 above in order to provide AdSAFE Services which may include the following specific purposes (as relevant to the particular circumstances):

- to respond to disclosures of abuse within the Church Setting;
- to provide helpline support related to Adsafe Services
- to facilitate connections between children and government child protection services;
- to facilitate counselling services;
- to assist with mandatory and other reporting requirements;
- to provide support services to victims of abuse;
- to appropriately address allegations;

- to coordinate independent investigations into alleged conduct;
- to screen present and prospective volunteers and staff who work with children or young people;
- to perform criminal history record checks or equivalent;
- to report all disclosures, suspicions, and allegations of children at risk of harm or abuse to authorities (e.g. Police, Government Child Protection services and Church authorities);
- to implement fellowship agreements with persons who have a sustained finding relating to allegations of sexual and physical abuse against a child or vulnerable person who wish to attend church services or activities;
- to train local Church Boards, staff and volunteers who work with children using the 'Safe Church' training manual, or a training program that meets similar 'standards'.
- to establish and administer a register of persons of concern and known offenders; and
- to process a person's application for redress

6. Direct Marketing

By using our website and services, you consent to the receipt of direct marketing material. We will only use your personal information for this purpose if we have collected such information directly from you, and if it is material of a type which you would reasonably expect to receive from us.

Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature.

7. Access and correction

Australian Privacy Principle 12 permits you to obtain access to the personal information we hold about you in certain circumstances, and Australian Privacy Principle 13 allows you to request that we correct inaccurate personal information subject to certain exceptions.

If you would like to obtain such access or request any such correction, please contact us as set out below.

8. Complaint procedure

If you have a complaint concerning the manner in which we maintain the privacy of your personal information, please contact us as set out below. All complaints will be considered by our privacy officer and we may seek further information from you to clarify your concerns.

If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

9. How we store information

We store information as follows:

- in our electronic database (with password protection);
- in paper files (stored in fire-proof strong room and in lockable filing cabinets);
- on our IT file server (with password protection);
- in cloud storage (with password protection and encryption);
- within our local Churches (accessible only by authorised personnel).

We have internal privacy practices and procedures in place that aim to ensure personal information is protected from misuse, interference and loss, unauthorised access, modification or disclosure.

We take measures to ensure the information we hold remains up to date, complete and relevant. If we determine that any information is not up to date, complete or relevant, we will seek to update the information, or take steps to destroy or de-identify the information.

10. We may disclose personal information to overseas recipients

On very rare occasions your personal information may be transferred to recipients located in New Zealand and the wider South Pacific region, including Papua New Guinea, Solomon Islands, Vanuatu, Fiji, Tonga, Kiribati, Western Samoa, American Samoa, Niue, Tuvalu, Cook Islands and Tahiti but only for the purpose outlined in Section 5 above and only if you wished to participate in church services or activities in their territory.

The Privacy Act (and specifically Australian Privacy Principle 8.1) requires us to take such steps as are reasonable in these circumstances to ensure that each of the overseas recipients do not breach the Australian Privacy Principles in relation to your personal information. However, if you consent to the disclosure of your personal information to the overseas recipients, we are not required to take such steps.

By continuing to accept our services, you consent to us transferring your personal information to these countries and Australian Privacy Principle 8.1 will not apply.

11. How to contact us about privacy

If you have any queries, or if you seek access to your personal information, or if you have a complaint about our privacy practices, please contact our privacy officer using one of the following means:

Post	email	phone
AdSAFE Privacy Officer	AdSAFE Privacy Officer	AU 1800 220 468
PO Box 966	privacy@adsafe.org.au	NZ 0800 442 458
Wahroonga NSW 2076		Ask for the privacy officer
Australia		