

MAYLANDS CHURCH OF CHRIST

Privacy Policy

1) Purpose

The purpose of this policy is to protect the Maylands Church of Christ community from the misuse of personal information, contribute to a culture of respect and integrity, and protect the rights of all involved in the church. This policy applies to the collection, holding, accessing, and correcting personal and sensitive information for all involved with Maylands Church of Christ community. This includes:

- Past, current, and prospective Maylands Church of Christ staff, volunteers, and congregation
- Visitors, suppliers, and contractors.

This policy uses, and adheres to, the definitions from the Privacy Act 1988 (Cth) and the General Data Protection Regulations (GDPR).

2) Personal information

This is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not. The type of personal information collected and held depends on the relationship between the individual and Maylands Church of Christ. Commonly collected information includes:

- Name, address (residential, postal, email), phone number, date of birth, gender, emergency contact details, and employment history
- Details of donations where receipts for taxation purposes are required
- Communications (e.g. letters, prayer requests)
- involvement in ministries
- Records of visits, phone calls and pastoral matters
- Staff details for superannuation, payroll, and taxation purposes.
- Information provided in surveys, registration forms, conversations, emails and online
- Photographs or video recording including CCTV footage

3) Sensitive information

This is personal information that is also information or an opinion about an individual's:

- Racial or ethnic origin
- Religious or political membership, affiliations, or beliefs
- Membership of a profession or trade
- Criminal record
- Health information

Collection and use

Information is only collected when it is reasonably necessary for the operations of Maylands Church of Christ. Collection and use will be lawful, fair, and transparent, and where possible directly from the individual. The individual will be advised of the purpose of collection prior to, or at the time of

collection. The information collected is adequate, relevant, and limited to the requirements.

Collection methods include:

- Enrolment, registration, or subscription data
- Submission from individuals
- CCTV cameras
- Monitoring of IT services
- Via websites (see the website policy below for more information)

Sensitive information will not be collected unless:

- Individual consent is given
- An exemption exists in the Privacy Act or GDPR
- Is required by government agencies

Where sensitive information is collected it will only be used for the purpose for which it was collected. It may be used for another purpose with the individual's consent, if reasonably expected by the individual to be used as such, or if authorised by Law.

4) Disclosure

Personal information will only be disclosed to:

- Government agencies to meet reporting requirements
- Those who have obtained the individuals permission in writing
- Emergency contacts in the case of an emergency

Maylands Church of Christ may disclose Personal Information to police, medical or hospital personnel, civil emergency services, or others assessed as necessary to respond to the emergency.

All personal information disclosed by individuals to staff and volunteers remains confidential between the individual and those responsible for that individual's welfare. Staff and volunteers may need to share with those who 'need to know' in order to provide appropriate care for the individual.

The following limitations apply:

- Where the information disclosed relates to a breach of the code of conduct, the Pastoral team may become involved
- Where information disclosed relates to a capital offence, Maylands Church of Christ is obliged to report that information to the relevant authorities
- When required by due process of law, Maylands Church of Christ will provide specific information as falls within the bounds of the legal requirement

Maylands Church of Christ is not responsible for the actions of congregants who disclose information they have received from other congregants.

5) Information management

Maylands Church of Christ will take all reasonable steps to:

- Destroy or de-identify all personal information that is no longer required for operations or to be retained by Law
- Ensure the information collected, used, and disclosed is accurate, up to date, and complete
- Ensure Personal Information is protected with integrity, confidentiality and with appropriate security

Maylands Church of Christ will ensure that the systems, tools and methods of capturing, transmitting and holding information are protected from misuse, interference, loss and from unauthorised access, modification or disclosure.

However, Maylands Church of Christ cannot be held responsible for the theft of data by a third party, or the loss of data through technical or technological malfunction, tampering by a third party, or any event that is beyond reasonable control.

Access by an individual to their Personal Information is made available upon request unless there is a legitimate reason for refusal, such as the release would conflict with existing legislative requirements or policy. All reasonable measures are taken to amend or remove information that is proven to be inaccurate, out of date, incomplete or misleading.

Maylands Church of Christ recognises the right of citizens of the European Union to withdraw consent at any time in accordance with this policy and has the right to erasure, data portability and the right to object.

6) Complaints & breaches

A failure to comply with this policy by a member of the Maylands Church of Christ community may be considered a breach of the code of conduct. If an individual believes that the policy has been breached, they should contact the relevant ministry leader or the pastoral team.

Once a breach is suspected the pastoral team will determine if the breach occurred. In the situation of a verified breach, they will assess the seriousness of the breach, who was involved and the actions to be taken.

If there is disclosure, access, or loss of information due to unauthorized actions that are likely to result in serious harm to those affected it is considered an eligible breach. If there is an eligible data breach Maylands Church of Christ will notify the Office of the Australian Information Commissioner (<https://www.oaic.gov.au/about-us/contact-us>) and those affected by the breach as soon as is practical.

7) Website Policy

This Privacy Policy governs the manner in which Maylands Church of Christ collects, uses, maintains and discloses information collected from users (each, a 'User') of the <https://www.maylands.church> ('Site').

Confidentiality

All personal information disclosed remains confidential between the individual and those responsible for that individual's welfare. Staff may need to share with those who 'need to know' in order to provide appropriate care to the individual. The following limitations apply:

- Where the information disclosed relates to a breach of the code of conduct, the pastoral team may become involved.
- Where information disclosed relates to a capital offence, Maylands Church of Christ is obliged to report that information to the relevant authorities.
- When required by due process of law, Maylands Church of Christ will provide specific information as it falls within the bounds of the legal requirement.

Maylands Church of Christ is not responsible for the actions of congregants who disclose information they have received from other congregants.

Personal identification information

Maylands Church of Christ may collect personal identification information from Users in a variety of ways in connection with activities, services, features or resources available on the Site. Users may visit the Site anonymously. Maylands Church of Christ will collect personal identification information from Users only if they voluntarily submit such information. Users can always refuse to supply personal identification information, except that it may prevent them from engaging in certain Site related activities.

Non-personal identification information

Maylands Church of Christ may collect non-personal identification information about Users whenever they interact with the Site. The non-personal identification information may include the browser name, the type of computer and technical information about Users means of connection to the Site, such as the operating system and the Internet service providers utilised and other similar information.

Web browser cookies

The Site uses 'cookies' to enhance a User's experience. The User's web browser places cookies on their hard drive for record-keeping purposes and sometimes to store information about the User's preferences for use of the Site. The User may choose to set their web browser to refuse cookies or to alert them when cookies are being sent. If they do so, note that some parts of the Site may not function properly as a result.

How Maylands Church of Christ use collected information

Maylands Church of Christ may collect and use Users' personal information for the following purposes:

- To run and operate the Site - Maylands Church of Christ may need your information to display content on the Site correctly.
- To improve customer service - The information the User provides helps Maylands Church of Christ respond to customer service requests and their support needs more efficiently.
- To personalise User experience - Maylands Church of Christ may use information in the aggregate to understand how Users as a group use the services and resources provided on the Site.
- To improve the Site - Maylands Church of Christ may use feedback Users provide to improve products and services.
- To send periodic emails - Maylands Church of Christ may use the email address a User provides voluntarily to respond to their inquiries, questions, and/or other requests.
- To send regular update emails - Maylands Church of Christ may use the email address a User provides voluntarily to send regular emails to inform the User of updates.

Access, Correction, Deletion of your information

Maylands Church of Christ respects your privacy rights and provides you with reasonable access to the Personal Data that you may have provided through your use of the Site. If you wish to access or amend any other Personal Data Maylands Church of Christ holds about you, or to request that Maylands Church of Christ delete or transfer any information about you, you may contact Maylands Church of Christ as set forth in the 'Contacting us' section. At your request, Maylands Church of Christ will have any reference to you deleted or blocked in our database(s).

You may update, correct, or delete your Account information and preferences at any time by writing to hello@maylands.church. Please note that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, Maylands Church of Christ may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where there is a reasonable believe that Maylands Church of Christ have a legitimate reason to do so.

At any time, you may object to the processing of your Personal Data, on legitimate grounds, except if otherwise permitted by applicable law. If you believe your right to privacy granted by applicable data protection laws has been infringed upon, please contact Maylands Church of Christ at hello@maylands.church. You also have a right to lodge a complaint with data protection authorities.

You may opt-out from the collection of navigation information about your visit to the Site by Google Analytics by using the Google Analytics Opt-out feature.

How Maylands Church of Christ protect your information

Maylands Church of Christ adopts appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on the Site.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Maylands Church of Christ cannot ensure or warrant the security of any information you transmit to Maylands Church of Christ or store on the Site, and you do so at your own risk. Maylands Church of Christ also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact Maylands Church of Christ as set forth in the 'Contacting us' section. If Maylands Church of Christ learns of a security systems breach, Maylands Church of Christ will inform you and the authorities of the occurrence of the breach in accordance with applicable law.

Sharing your personal information

Maylands Church of Christ do not sell, trade, or rent Users' personal identification information to others. Maylands Church of Christ may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our ministry partners and trusted affiliates for the purposes outlined above. Maylands Church of Christ may use third-party service providers to help us operate our ministry and the Site or administer activities on our behalf, such as sending out newsletters, surveys, or hosting. Maylands Church of Christ may share User information with these third parties for those limited purposes, provided the User has given permission. This permission is obtained when the User uses this Site as outlined below in 'Your acceptance of these terms'.

Electronic newsletters

If the User decides to opt-in to one or more of Maylands Church of Christ mailing lists, they will receive emails that may include ministry news, updates, related opportunity or service information, etc. Maylands Church of Christ may use third party service providers to help operate Maylands Church of Christ ministry and the Site or administer activities on Maylands Church of Christ behalf, such as sending out newsletters or surveys. Maylands Church of Christ may share the User's information with these third parties for those limited purposes provided that the User has given their permission. This permission is obtained when the User decides to opt-in to Maylands Church of Christ mailing list(s).

Compliance with children's online privacy protection act

Protecting the privacy of the very young is important to Maylands Church of Christ. For that reason, Maylands Church of Christ requires parental/legal guardian consent for anyone under 18 years old who participates in Maylands Church of Christ ministry (see Child protection policy).

Changes to this privacy policy

Maylands Church of Christ has the discretion to update this privacy policy at any time. When this happens, Maylands Church of Christ will post a notification on the main page of our Site and revise the date at the bottom of this document to reflect the date of these changes. Maylands Church of Christ encourages the User to frequently check for any changes and to stay informed about how Maylands Church of Christ are helping to protect the personal information collected. The User acknowledges and agrees that it is their responsibility to review this privacy policy periodically and become aware of modifications.

Your acceptance of these terms

By using the Site, the User signifies their acceptance of this policy. If the User does not agree to this policy, please do not use the Site. Continued use of the Site following the posting of changes to this policy will be deemed as the User's acceptance of those changes.

Contacting us

If you have any questions about this Privacy Policy, the practices of the Site, or your dealings with the Site, please contact us. 41 Eighth Avenue, Maylands, WA, 6051 Australia +61 8 6323 8676. For privacy specific enquiries you can contact: hello@maylands.church

This document was last updated on 09/2023

8) Compliance with this policy

- (1) If the board has a reason to believe a person subject to the policy has failed to comply with it, it will investigate the circumstances.
- (2) If it is found that this person has failed in their responsibilities, the board may take action against them.
- (3) If a person suspects that a board member has failed in their responsibilities, they must discuss the matter with the person in question and notify the Board.

9) Revision

- (1) This policy will be reviewed and revised every three years
- (2) Current policy date and version: version 1 (2023)
- (3) Next review: 2026

10) Related resources

- (1) <https://www.oaic.gov.au/privacy/privacy-guidance-for-organisations-and-government-agencies/more-guidance/australian-entities-and-the-european-union-general-data-protection-regulation>
- (2) <https://www.oaic.gov.au/privacy/privacy-legislation/the-privacy-act>

11) **Contacts**

For questions about this policy, contact the board by email at hello@maylands.church