

# Power to Change Privacy Policy Statement

Power to Change formerly Campus Crusade for Christ Australia is committed to providing you with the highest levels of customer service. This includes protecting your privacy in accordance with the National Privacy Principles (Commonwealth Privacy Act 1988). The following outlines how we use your information and protect your privacy.

We may, from time-to-time, update this Privacy Statement, so we encourage you to review it periodically. We will notify you (by email or prominent notice on this site) about changes in the way we treat your personal information and how those changes are likely to impact you.

Power to Change has several websites, mobile apps, other digital tools and several offices around Australia with many arenas of ministry. This Privacy Policy Statement/Document governs our use in all of these. Where we use the terms "we", "us" or "our", we refer to Power to Change in Australia and affiliated ministries.

## Your personal information

Personal information held by Power to Change may include personal information such as your name, date of birth, current and previous addresses, telephone/mobile phone number, email address, demographic information, gender, marital status; Financial data including but not limited to bank account or credit card details, past and current transactions; occupation and application details; information about beliefs and circumstances including religious information; information you disclose about your personal circumstances; location data that is information about your physical location, including IP address, and lat/long coordinates and country of origin (where applicable); marketing and communication data including your preferences in receiving marketing from us and communication preferences; requests and preferences including communication preferences, your interests and prayer requests; travel information including your travel details, delegate information, dietary requirements, and room preferences. We also hold details of your financial support and donations, including the Power to Change workers and ministries you may be supporting.

If you wish to remain anonymous this can be achieved only in relation to donations made anonymously or by the use of a pseudonym. In those circumstances a receipt may not be able to be issued to you.

When we do receive credit card details or banking details in relation to an electronic donation we enter the donor's name and amount into the system and then destroy all financial information. We then do not have access to that financial information.

In relation to staff, missionaries [and volunteers] we also hold information provided as part of the application and screening process and on-going personnel records.

If you choose not to provide personal information, we may not be able to provide you with the services you require, or the level of service on which we pride ourselves.

## How we collect personal information

We will generally only collect and use your personal information when it is necessary to achieve our legitimate interests of fostering spiritual growth, which includes providing spiritual guidance, coaching, events, meetings and other tools. We may also use your personal information when it is needed to provide you with goods or services, or to process donations or to comply with our legal obligations.

Power to Change collects personal information in a number of ways, including:

- Directly from you when you enquire about our activities, engage in an activity with us, make a donation, register through one of our sites or at an event, or otherwise give us your personal information. If you meet with us for discipleship or spiritual advice, we may take confidential

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- notes for spiritual guidance and support. If you prefer that we do not take notes, please let us know. The information you disclose is entirely at your discretion
- From third parties: we will only collect personal information from third parties if they have obtained that information in a legal and proper way
- From publicly available sources of information
- From the organisations identified below, under 'When We Disclose Your Personal Information'
- From our own records
- Cookies and other automated technologies: when you interact with our Digital Tools we may use cookies and similar technologies to track activities (for more information, see "Cookies and Information Collected by Technology" below). We also track usage of mobile apps through analytics
- From individual Power to Change team member(s). As you interact with team members, there will be occasions where we will collect and store basic personal information. This is only done when you choose to give these details to the team member. These details may be shared within Power to Change only for the purpose you gave the information. When you partner with Power to Change, either in prayer or financially, through an individual team member, that team member will keep a copy of your name, address, and donation information on their own donation service (ie MPDx), as well as the details being stored securely by Power to Change's system. This will help the team member send you newsletters and to keep you updated with what's happening. Some team members also choose to record your date of birth on their calendars to wish you a happy birthday when the time comes
- We have a Data Protection Policy in place, which complies with Australian Law. This helps our team members store information wisely. You are welcome to ask them how they store your information

### How we use your personal information

Your personal information may be used in order to:

- Provide the services you require
- Administer and manage those services, including charging and billing for services
- Inform you of ways the services provided to you could be improved
- Conduct appropriate checks for credit-worthiness and for fraud
- Research and develop our services including marketing
- Gain an understanding of your information and communication needs in order for us to provide you with better Service
- Maintain and develop our business systems and infrastructure, including testing and upgrading of these systems

### When we disclose your personal information

Generally, we will not disclose or share your personal information (including your email address) with anyone outside our organisation without your permission. However we may need to use or share your information with our partners and agents who provide goods and services to you on our behalf. For the purposes set out above we may disclose your personal information to organisations outside Power to Change. The organisations to which we disclose information include:

Outsourced service providers (if applicable) who manage the services we provide to you, including:

- Banks and other financial institutions (such as superannuation funds)
- Customer enquiries
- Mailing systems
- Billing and debt-recovery services
- Information technology services
- Installation, maintenance and repair services

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- Marketing
- Cloud-based information storage services. We have engaged a cloud-based services provider who guarantees security of the information in accordance with best practice

### Your representatives (e.g. your authorised representatives or legal advisors)

- Credit-reporting and fraud-checking agencies
- Credit providers for credit related purposes such as credit-worthiness, credit rating, credit provision and financing
- Our professional advisors, including our accountants, auditors and lawyers
- Government and regulatory authorities and other organisations, as required or authorised by law
- Organisations involved in:
  - A transfer / sale of all or part of our assets or business (including accounts and trade receivables)
  - Managing our corporate risk and funding functions (e.g. securitisation)
- Other telecommunication and information service providers
- Our related companies

### Consent to collect and use your information

You give us permission to collect, store and utilize any personal information described herein by using online resources, including but not limited to:

- Browsing any of our web sites
- Requesting information or materials
- Sending us an e-mail
- Completing a donation through any of our web sites
- Registering for a conference/event through any of our web sites
- Purchasing materials through any of our web sites

### Your Rights

If you wish to exercise any of these rights, please email [info@powertochange.org.au](mailto:info@powertochange.org.au). We will respond to your request within 30 days of accepting it. Before accepting your request we may need to ask for some identity documentation from you, to make sure we don't inadvertently provide your personal information to someone else.

#### **a. Editing and updating personal information**

If you find that your personal information needs to be edited or updated, you can change your personal information by asking us to update it by contacting us at [info@powertochange.org.au](mailto:info@powertochange.org.au). Please make sure to provide us with all the information we need to be able to address your request, including both the old and new information.

#### **b. Accessing personal information**

You can request details of your personal information we hold. We will confirm whether we are processing your personal information and provide additional details including what kind of information we have about you, where we collected it, how we use it (including the legal basis for our processing), how long we expect to keep it, details of any automated decision making or profiling and the safeguards regarding data transfers to non-European Economic Area, subject to the limitations set out in applicable laws and regulations.

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If you ask us, we will provide you with a copy of your personal information free of charge. We may charge you a fee to cover our administrative costs if you request multiple copies of the same information or if the requests are manifestly unfounded or excessive.

### **c. Deletion of personal information**

At your request, we will delete your personal information if:

- it's no longer necessary to retain your personal information;
- you withdraw the consent which formed the basis of your personal information processing;
- you have successfully objected to the processing of your personal information (see below);
- your personal information was processed unlawfully; or
- we are required to delete your personal information to comply with our legal obligations.

We will review requests on a case-by-case basis and we might not be able to comply with your request if we need to process your personal information:

- for exercising the right of freedom of expression and information;
- to comply with our legal obligations;
- to establish, exercise or defend a legal claim; or
- to perform a task in the public interest.

If this is the case, we will notify you of the reasons why your request was rejected.

### **d. Restriction of processing of personal information**

You have the right to request us to limit the processing of your personal information if:

- you dispute the accuracy of your personal information;
- your personal information was processed unlawfully and you request a limitation on processing, rather than a deletion of your personal information;
- we no longer need to process your personal information, but you need your personal information in connection with a legal claim; or
- you object to the processing of your personal information based on our legitimate interests pending verification as to whether we have an overriding legitimate ground for such processing.

To the extent needed, we may still keep some of your data to ensure we comply with your request to limit processing, or for other legal purposes.

### **e. Objecting to certain types of processing including automated decision making**

Where we process your personal information based upon our legitimate interests, you have the right to object to this processing on grounds relating to your particular situation if you feel it impacts on your fundamental rights and freedoms.

Where we process your personal information based upon our legitimate interests and where decisions are made by automated processing which has a legal or other significant effect on you, you may also object to such automated decision making.

### **f. Portability of personal information**

You can request us to send you your personal information in a structured, commonly used, machine-readable format so that it can easily be transferred and used by a third party if:

- you provided us with the personal information;
- the processing of your personal information is based on your consent or required for the performance of a contract; or
- the processing is carried out by automated means.

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### **g. Withdrawing consent**

We primarily rely on legitimate business interests to process your data, but to the extent we use consent to process your data, you have the right to withdraw any consent you may have given us at any time. We will comply with your request promptly.

If you withdraw your consent, we might not be able to provide some of our products and services to you. At any point, you have the right to object to processing of your personal information for direct marketing purposes and we will promptly comply with your request.

### **h. Filing a complaint with a data protection authority**

We will try to resolve any problems that you have but you are always able to contact your local data protection authority for assistance or to make a complaint.

## Cookies and information collected by technology

Our digital tools may use cookies to keep track of web site activities, save your password or deliver content specific to your interests. A cookie is a small data file that certain websites write to your hard drive when you visit them. A cookie file can contain information such as a user ID that the site uses to track the pages you've visited. The only personal information a cookie can contain is information you supply yourself. You can find out more about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org). Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience certain interactive features of the site or access all of the services provided through the site.

## How long we keep your personal information.

We keep your information as long as it is needed to achieve our purposes listed above, as well as for the amount of time necessary to meet any legal, tax or reporting requirements.

## Help us to ensure we hold information

Power to Change takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information you provide. That's why we recommend that you:

- Let us know if there are any errors in your personal information
- Keep us up to date with changes to personal information such as your name and address

## Security of personal information

We take all reasonable steps to ensure that your personal information is secure including using a cloud-based information system, which satisfies security industry protocols.

We have procedures to deal with any suspected personal data breach and we will promptly notify you and any applicable regulator of a breach in accordance with our legal obligations.

We cannot guarantee that the security measures we implement in connection with the operation of the site will absolutely prevent others from accessing or acquiring any information that you provide while using the site. You can help us protect your personal information by properly protecting your password and remembering to sign out of your account and close your browser window when you finish visiting our site, especially if you are on a shared or public computer.

## You can access your personal information

You have a right to access your personal information, subjects to some exceptions allowed by law. If you would like to do so, please let us know. You may be required to put your request into writing for security reasons.

## Special rules for children

We do not collect personal information from children under the age of 13 beyond what is necessary for them to participate in our online or other activities, such as registering for a conference or downloading materials usually associated with parental permissions. If we discover that we have accidentally collected personal information from a child below the age of 13, we will delete it from our records as soon as reasonably possible. *(For Australians, this section is related to our international obligations.)*

If a child, under the age of 16 in the EEA, or under the age of 13 elsewhere, attempts to register with one of our tools, purchase products or materials, or participate in an activity requiring the submittal of personally identifiable information, a parent or guardian must give permission and consent for that child to provide information and register. The only personal information we collect from a child is information that is necessary for the child to participate in activities, such as an address for making a purchase. Parents have the right to request at any time that the information collected about their child is removed from our database.

## How to contact us

If you have any questions in relation to privacy, please email us at [info@powertochange.org.au](mailto:info@powertochange.org.au) or write to us at Power to Change, PO Box 565, Mulgrave, Victoria 3170.