



PRIVACY POLICY

SHINE CAMBODIA INCORPORATED

Approved Date

3 August 2017

Approved by

The Board

Next Review Date

3 August 2018

Policy Owner

Project Manager

1. Overview

Shine Cambodia Incorporate (**'Shine'**) considers privacy and data protection to be important matters. Shine will endeavour to handle your personal information in accordance with this Policy and the Australian Privacy Principles (**'APPs'**).

This Privacy Policy is designed to help you understand how we collect, use and store personal information, and what to do if you have any questions, concerns or complaints. We want you to know that the information we collect is yours, and you can choose to change or access it at any time.

We will review our privacy policy from time to time and it will always be publicly available on our websites.

2. Types of Information Collected

Personal information

Whether you're a donor, program participant or volunteer, we regularly ask for information that helps keep us engaged with you.

Here are some examples of personal information we commonly collect:

- Personal details, for example, your name or date of birth
- Contact details
- Payment information
- How you supported or interacted with Shine in the past
- Notes from conversations with Shine representatives

Sensitive information

Shine also collects sensitive and health information. For instance, where you disclose a political opinion or affiliation, or where you complete a medical form to participate in an Shine event, you are providing Shine with more detailed information. We will only collect, hold, use and disclose sensitive and health information with your consent, or where required by law.

3. Information Collection Process

Direct collection of information

In most of these cases, Shine will ask you directly for information (for example, requesting you to complete a donation form or a medical form). Often, to enable our operations, we will need a certain amount of information; for instance, we cannot give you a tax receipt without your name or email address.

Automatic collection of information

Some of the information may be collected automatically (for example, when you 'like' a post of Shine's on social media), or from another source (like certain confidential payment details that pass through third-party service providers).

There are a number of technological measures that we use to collect information Shine may:

- a) Use "cookies" provided by third parties to help us better understand how people arrive at and use our website and social media platforms;
- b) Collect IP addresses to better understand where our traffic is coming from, and to provide cus-

tomised services to supporters;

- c) Use third-party services such as Google Analytics. This helps Shine understand traffic patterns, detect problems and improve functionality with our websites; and
- d) Use embedded images in emails to track open rates for its mailings, so that Shine can tell which mailings appeal most to its supporters.

URLs contained in emails may contain an ID that enables us to correctly identify the person who takes an action using a web page. We use these URLs to simplify the process of signing petitions and filling out surveys.

4. Information Use

Organisational engagement

In order to raise awareness, fundraise and engage with the public, we need to collect personal information. Shine will typically use your personal information to:

- a) Process donations;
- b) Email Shine related information, updates and opportunities we think will interest you
- c) Respond to any questions, comments, queries or concerns;
- d) Request feedback to improve our services and processes;
- e) Update your history and engage and support of Shine; and
- f) Analyse donor activity.

Disclosure to an external party

Shine will only disclose your personal information to an external party when it is necessary. We will take reasonable steps to ensure that these parties deal with any personal information appropriately. These reasonable steps could include:

- a) Providing external parties with a copy of this privacy policy;
- b) Keeping the information anonymous where possible; or
- c) Reviewing the external party's policies regarding privacy and confidentiality.

When running joint petitions with other organisations, Shine will ensure that anyone contributing to the petition is informed about how and with whom their information will be shared (e.g. other organisations, who the petition is targeted at). Where possible, this information will be limited to name and postcode.

5. Keeping Information Safe

Secure collection of information

Whether it be online or in hard copy, when we collect your information we endeavour to do so through a secure response form. We will take appropriate security measures to protect against unauthorised access to your personal information.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. While Shine strives to protect personal information, it cannot guarantee the security of any information received. As such, provision of such information is done at your own risk. Once your transmission is received, Shine will take all reasonable steps to ensure its security and integrity.

Secure storage of information

Information is stored on Shine's cloud systems, such as Google Drive and Dropbox. Information on these cloud systems are also protected by the standard security processes outlined below.

Shine uses industry standard security technology, as well as industry standard security practices, to protect personal and confidential information that we receive and to prevent that information from being accessed by unauthorised persons.

Destroying and de-identifying information

If you send us your personal information when we don't ask for it, we will determine whether or not it would have been permissible to collect that information if we had asked for it. If we find that the collection would not have been permissible we will destroy or de-identify that information as soon as practicable. If we find that the collection would have been permissible, then we will treat the information in accordance with this policy.

Shine will also destroy or de-identify information that is no longer needed. Examples of information that is no longer needed include:

- a) Sensitive Information regarding attendees of an event after the event has ended; and
- b) Volunteer information after the volunteer ceases their role with Shine;

Unique categories of information

If you have supplied us with sensitive or health information, Shine will not use or disclose it for anything other than what you have consented to. This is subject to any legal requirement of disclosure.

Shine takes the transfer of payment information very seriously. In the case of payment or card details, when we activate this function, Shine will take special care to ensure that third-party service providers are Payment Card Industry Data Security Standard compliant.

Where a donor requests for their donations to be anonymous, the information required to process the donation will still be stored via the processes outlined in this policy. However, the donor's name will not be publicly listed.

6. Underage Information

Shine often needs to collect information from children (anyone under the age of 18) such as where a child engages in Shine events and campaigns. Information collected includes personal information, sensitive information and parental consent forms.

All underage information will not be disclosed elsewhere by Shine without prior parental guardian consent.

Underage personal information will be stored on NationBuilder and secured in the same manner as other personal information.

Shine acknowledges that children are a vulnerable segment of the community and that their sensitive information should be treated with care. The following processes should be undertaken regarding underage sensitive information:

- a) It should be stored separately from other sensitive information, for example being stored in a different online folder;
- b) After the event's conclusion, all underage sensitive information should be destroyed within a reasonable period of time;

7. Cross Border Disclosure

In the event that Shine does disclose personal information about you to an overseas recipient, such as a

partner organisation, Shine will take such steps as are deemed reasonable in the circumstances to ensure that the overseas recipient does not breach the APPs in relation to the information. Such steps could include:

- a) Providing overseas recipients with a copy of the APPs and this privacy policy;
- b) Investigating the overseas recipient's privacy practices;
- c) Suggesting implementation processes in line with the APPs; or
- d) Incorporating the privacy policy or APPs in any agreement or Memorandum of Understanding signed.

8. Maintaining Your Information

We will take all reasonable steps to ensure any personal information we collect, use or disclose is up to date and accurate. Your personal information is only held by Shine for as long as the information remains relevant to the purpose for which it was collected.

If you believe that the personal information we hold about you is not up to date or accurate, you may ask us to correct it. You may also ask us to provide you with details of the personal information we hold about you, and copies of that information.

You can manage and update your information by getting in touch with a member of our team via email at contact@shinecambodia.org. We will respond to your request within 7 days of receipt of your request.

9. Complaints

If you wish to make a complaint about a breach (or alleged breach) by Shine of this Policy or of the Australian Privacy Principles, you can email us at contact@shinecambodia.org

In the event that you are not satisfied with the action undertaken by Shine, you may contact the Office of the Australian Information Commissioner whose details can be found at www.oaic.gov.au.