

Privacy (External) Policy

EFFECTIVE DATE	1 July 2020				
REVIEW DATE	1 July 2023				
POLICY OWNER	Chancery				
APPLIES TO	This Policy applies to individuals who have Personal Information that may be collected by the Diocese of Lismore.				
EXCLUSIONS	There are no exclusions to this policy.				
RELATED POLICIES, GUIDELINES & PROCEDURES	Privacy (Internal) Policy Acceptable Use of Electronic Communications Systems & Devices Code of Conduct Policy				
REFERENCE	Privacy Act 1988 (Clth) Privacy Regulation 2013 (Clth)				
RELATED FORMS	There are no forms related to this policy.				
HEADINGS	Objective Definitions Policy 1. Personal Information 2. Sensitive Information 3. How we Collect your Information 4. Storage, Use and Disclosure of Personal Information 5. Security of Personal Information 6. Online Donations 7. Access to Personal Information 8. Complaints 9. Terms of Use Revision/ Modification History Approval Date/ Revision History				
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OBJECTIVE

This policy is to inform individuals about how the Diocese collects, stores, uses and in some circumstances discloses their personal information.

DEFINITIONS

Diocese means the Roman Catholic Diocese of Lismore and includes without limitation any Diocesan agencies, corporations, entities, parishes, parish corporations and parish entities where the Worker is employed or otherwise engaged.

Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a) whether the information or opinion is true or not; and
- b) whether the information or opinion is recorded in a material form or not.

Secondary Purpose means any purpose other than the primary purpose for which the Diocese collected the personal information.

Sensitive Information means:

- a) information or an opinion about an individual's:
 - i. racial or ethnic origin; or
 - ii. political opinion; or
 - iii. membership of a political association; or
 - iv. religious beliefs or affiliations; or
 - v. philosophical beliefs; or
 - vi. membership of a professional or trade association; or
 - vii. membership of a trade union; or
 - viii. sexual orientation or practices; or
 - ix. criminal record;

that is also personal information; or

- b) health information about an individual; or
- c) genetic information about an individual; or
- d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- e) biometric templates.

POLICY

1. Personal Information

Personal Information is any information that can be used to identify you. We will collect and maintain in our database certain personally identifiable information from you when you provide it to us on a voluntary basis, for example, when you make an enquiry, contact us, complete a registration or form, subscribe to our newsletter or forums, establish an email account or make a payment/ donation. Typically, your personal information would include your name, address, telephone number, email, payment card details (including transaction details/ history) and date of birth.

You can choose not to provide your personal information to us or you may just want to deal with us anonymously or by using a pseudonym. If this happens, we may not be able to provide you with the information you asked for or give you the level of service you expect.

When you look at our website, please also be aware that our Internet Service Provider makes a record of your visit and logs information about it. This is the usual practice for an Internet Service Provider. This information may include but is not limited to:

- Your server address;
- Your top level domain name (for example .com, .gov, .au, etc);
- The date and time of your visit to the site;
- The pages you accessed, and documents downloaded;
- The previous site you have visited; and
- The type of browser you are using.

2. Sensitive Information

Some of the personal information collected may be considered sensitive information such as details of your race or religion. If you are applying to work with the Diocese we may require that you allow us to collect information about your criminal history. Where practicable, we destroy sensitive information after it has served its purpose. Except in some specific circumstances, will only collect your sensitive information if you give us permission. We will not disclose it for a secondary purpose unless the secondary purpose is directly related to the primary purpose for which it was collected. We will not share it with related entities or otherwise for a secondary purpose.

3. How we Collect your Information

We will only collect personal information that is reasonably necessary for one or more of our functions or activities. We conduct many functions, services and activities for the purposes of promoting the Catholic faith within the Diocese. This includes, among other things, serving the Catholic Church community within the Diocese, assisting and supporting parishes within the Diocese, liaising with members of the public and carrying out ministries from time to time.

We collect personal information from individuals when it is reasonably necessary to enable us to carry out our mission, activities and ministries, which includes:

- providing religious services to you and the community, including administering sacraments and pastoral care;
- providing you with information that we think you might be interested in, in relation to news about and events held by the Catholic Diocese of Lismore;
- carrying out fundraising campaigns and appeals, including use of information to process donations, and communicating with parishioners and our supporters; and
- communicating with the public who contact us with queries, comments or complaints.

We may also collect personal information for secondary purposes for which a person would reasonably expect us to use or disclose his or her personal information. For example, your personal information may be collected for the purpose of becoming a Parishioner for the purpose of making sacraments such as baptism, confirmation, communion and marriage. Your personal information may also be collected at the time of making a Donation by either following a link to Donate and entering your personal information or by completing a form to make a Donation.

We collect information from you in different ways. Our usual practice is to collect personal information directly from you. For example, you might send an email to us directly or through the online form on our website which will contain your personal information or you might provide your local parish priest with personal information such as your contact details.

In most cases, we require you to consent specifically to any collection, use or disclosure of your personal information by us. Your consent may be explicit, such as in writing or verbally, or may be implied by conduct. There are times where we collect personal information about you from a third party, for example, in situations where it is impracticable or unreasonable to collect directly from you or when you would reasonably expect your personal information to be collected from another source. For example, we may be given a form relating to a baptism that contains the names and religion of the parents and godparents of the child. If you provide us with personal information of a third party, you warrant to us that you have obtained the consent of that person(s) for you to disclose their personal information to us and for us to collect and use their personal information pursuant to the terms of this Privacy Policy.

4. Storage, Use and Disclosure of Personal Information

We will store and use your personal information for the purpose for which it was collected (see above), for any secondary purposes directly related to that primary purpose(s), or to comply with our legal obligations. We generally do not disclose your personal information to other organisations unless we believe it is reasonably necessary to conduct the functions and activities of the Diocese, if you give your consent, or if it is required or authorised by law.

We use a range of suppliers, service providers, contractors and other third party partners to enable the activities and functions of the Diocese including information technology service providers, banks and credit card companies.

All information collected in the manner outlined above (under 'How we Collect your Information') will be shared with the administrative branch of the Diocese (Diocesan Chancery) for planning, reporting, administrative and fundraising purposes. Each parish in the Diocese of Lismore, will, from time to time, share personal information with other parishes within the Diocese. This allows parishes to transfer information between them when the need arises, for example, when a person is to receive a sacrament in another parish or when a person's personal details, such as their contact address, have changed. In providing your information to us, you are consenting to the disclosure of your information to such entities outlined above without the need to obtain your consent to do so.

We may also disclose personal information to the public from time to time with either the consent of the person to which the information relates or from a third party when we are reasonably satisfied that the person to whom the information relates would consent to our use of the personal information. Examples of such use include the disclosure of the first and last names of sick persons in parish bulletins (either disclosed to us by the persons themselves or by their friends or family) and the announcement of such names during prayers of the faithful at Mass.

We may use your personal information to send you information about our work and promotional or marketing material from time to time. We may provide you with material that we believe would be of interest to you in person, by mail, phone, email, text, and online via the internet and in apps, unless you tell us not to. We will make sure that any such emails, texts and letters that we send to you clearly tell you how to opt out. You can opt out of receiving promotional or marketing material at any time by following the opt-out instructions on the materials you received or by contacting us, details of which are contained below in this Policy.

Some third party providers we use, for example, for cloud storage of electronic data, may be located outside of Australia. We are committed to safeguarding personal information held by us and will comply with all applicable laws relating to the cross-border data disclosure.

5. Security of Personal Information

We take reasonable steps to ensure the security of personal information, in both physical and electronic forms, by storing it in a secure environment. Any contract service providers used will also be bound by our Privacy Policy and all employees, contractors and third party service providers are required to comply with this Policy.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any guarantee regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

6. Online Donations

Donations made online on this website (if applicable) or on any of the Dioceses' Parish websites are processed in real time using a secure payment gateway.

7. Access to Personal Information

We take all reasonable steps to ensure that personal information we collect, hold, use and disclose is complete, accurate, relevant and up to date.

If you would like to access or make corrections to your personal information, please contact the Privacy Officer. We may ask you to verify your identity before we disclose any personal information.

If you wish to have your personal information removed from our database, we will take all reasonable steps to comply with your request, unless we need to keep your information for legal, audit or internal risk management reasons.

8. Complaints

We have appointed a designated Privacy Officer who is responsible for investigating any complaints or concerns any person may have about our protection of their privacy. The Privacy Officer can be contacted as follows:

Email: business@lismore.catholic.org.au

Tel: 02 6621 9444

Post:

Privacy Officer
Catholic Diocese of Lismore

PO Box 1

LISMORE NSW 2480

Once we become aware of any ongoing concerns or problems raised by you about our privacy practices, we will take these issues seriously and work to address those concerns. There is no fee associated with lodging such a complaint. Provided we have all the necessary information required to adequately investigate your complaint, we will endeavour to respond to you within 30 calendar days. Should we require further information, we will contact you to do so.

9. Terms of Use

By using our website or the websites of any of the Parishes or entities within our Diocese, and by providing information to us, you are consenting to the collection and use of your personal information (including sensitive information) for the purpose it was intended.

REVISION/ MODIFICATION HISTORY

Date	Version	Current Title	Summary of Changes	Approval Date	Commencement Date
1 May 2020	1	Privacy (External) Policy	Initial Policy	15 June 2020	1 July 2020

APPROVAL DATE/ REVISION HISTORY

Approved by: Bishop Gregory Homeming

Date: 15 June 2020

To be revised: 1 July 2023