

**Blessed to Bless Incorporated**

**operating as Zambia's Child**

[blessedtoblessaustralia@gmail.com](mailto:blessedtoblessaustralia@gmail.com).

## **Privacy Policy**

**This version current as at 1 September 2024**

This policy sets out how Blessed to Bless Incorporated, trading as Zambia's Child (We), will handle (collect, use, store and disclose) personal information (in accordance with the Australian Privacy Principles (APP's) under the *Privacy Act 1988* (Cth) (**Privacy Law**) in the light of who we are.

We are committed to protecting the privacy and security of personal information. This Privacy Policy explains how we collect, use, disclose and safeguard your information.

### **1. Collecting your personal information**

We collect personal information about supporters, volunteers, employees, contractors, visitors to our school and others. We collect this information when it is necessary for our organisational purposes as detailed in Item 2. Most often, we collect personal information about our supporters. Typically, we would ask for your: name, address, telephone number(s) email address(es), payment card information and date of birth.

On occasion, we might also collect images of you or stories about you, for example, if you have visited Ipalo Christian School or if you have attended one of our events.

Where possible, we will collect personal information directly from you, for example:

- In forms filled out either online or in hard copy
- Face to face
- Via email
- Via online surveys
- Via social media messages or conversations
- During telephone conversations

Where we collect your personal information from someone else, and it is unclear whether you have consented to the disclosure of your personal information to us, we will take reasonable steps to contact you and to ensure that you know how we obtained this information.

You may choose to deal with us anonymously. However, if you choose to do so, we may not be able to meet your expectations. For example, we cannot issue a tax receipt or send you information about your sponsored child, or about our events and projects if we do not have your name and address / email address.

We will only collect and store your payment card information in compliance with the Payment Card Industry Data Security Standard.

## **2. Using your personal information**

We might use your information, and you consent to us using your information, for the following purposes:

- for the immediate reason for which you have given it: for example, to enable us to process your request (eg. gift, payment, membership, change of details, sponsorship) including issuing you with a receipt);
- to maintain contact with you about our work: report back to you about what is happening at the Ipalo Christian School and with the children and school community;
- to let you know about other opportunities to give financially or other marketing activities;
- maintain membership lists;
- manage donor and supporter lists;
- co-ordinate and manage volunteers;
- send newsletters or updates to donors, supporters and members;
- account for activities or expenses;
- provide supporting evidence when seeking grants or other funding;
- any other purpose related to our work, including surveys and feedback; and
- to comply with relevant laws.

Where we tell you about opportunities with partner organisations, we do not disclose your personal information to them. If you respond to that organisation directly and give them your details, they may contact you.

## **3. Opting out or modifying your information**

We do not retain information about you that we do not need to properly perform our work and services. We try to ensure that all information that we do retain about you is necessary, accurate, complete and up-to-date.

Where we use your personal information to send you marketing and promotional information by post, email or telephone, we will provide you with an opportunity to opt out of receiving such information. By electing not to opt out, we will assume that we have your implied consent to receive similar information and communications in the future.

You can elect not to receive further information from us by contacting us at [blessedtoblessaustralia@gmail.com](mailto:blessedtoblessaustralia@gmail.com). Please allow 5 days for your request to be processed.

If we have contacted you by email, you can use the unsubscribe function in that email to notify us that you do not want to receive further information in that way.

If we use personal information in ways other than as stated in this policy, we will ensure we comply with the requirements of the Privacy Law.

#### **4. Disclosing your personal information**

We do not disclose your personal information to other organisations except for in direct connection with our core business purposes as detailed in 2 above;

We do not rent, sell, or exchange your personal information, including to any third party service providers who facilitate the sharing of information other than between charitable or like-minded organisations.

You can expect that information about you might be given to providers of services to us, for example: banking, payment card data processing, mail delivery and sorting (including electronic), telecommunications, information technology, information storage, printing, market analysis or research, website usage analysis, legal, audit or accounting.

Due to the nature of our work, some of our providers may be located overseas and receive your personal information, within the limits provided above, from time to time. We will take reasonable steps to ensure that overseas company are aware of and do not breach the APP's.

#### **5. General Data Protection Regulation**

Residents of UK & EU - The General Data Protection Regulation (GDPR) relates to EU and UK residents' control over their Personal Data. It is a comprehensive law that provides greater data rights for individuals and requires organisations who control and process data to comply with data protection principles. Personal Data means data that relates to an individual which, in isolation or in combination with other information, enables the individual to be identified directly or indirectly. Where the GDPR applies with regard to any Personal Data We collect, then this section applies. For the purpose of GDPR, We are the 'controller'. If You are a resident in the EU or UK, you have the following rights with respect to your Personal Data, and can exercise them by sending a request to the Privacy Officer at [blessedtoblessaustralia@gmail.com](mailto:blessedtoblessaustralia@gmail.com) . Those rights include:

- The right to be informed about the collection and use of your Personal Data at the time it is collected from you. This includes the purposes for processing your data, how long it will be kept for, and who it will be shared with.
- The right of access – you can obtain a copy of your Personal Data.
- The right to have your inaccurate Personal Data rectified or completed if it is incomplete. We must reconsider accuracy upon your request.
- The right to remove your Personal Data, aka 'the right to be forgotten'. This applies if the Personal Data is no longer necessary for the purpose which it was originally collected or processed for, or if you withdraw your consent and there is no other lawful basis for holding your data.
- The right to restrict processing. You can limit the way your data is used in the certain circumstances for instance, if you contest the accuracy of your Personal Data and we are verifying it.
- The right to data portability. A right to have your data moved, copied, or transferred easily from one IT environment to another securely and without affecting its usability. You can request direct transfer of your data to another controller.
- The right to object, in certain circumstances, to the processing of all or some of your Personal Data or for particular purposes.
- Rights in relation to automated decision making and profiling. You have a right to be informed of and to receive information about automated decision making and profiling of your data, and a right to request human intervention or challenge an automated decision.

## 6. Securing your information

We will take all reasonable steps to keep information we hold about you secure (whether electronic or in hard copy) and to keep this information accurate and up to date. This includes complying with the Payment Card Industry Data Security Standard, which covers security or payment card information. Our committee members and service providers are also required to keep personal and payment card information confidential and secure.

It is our policy to:

- Permanently de-identify personal information where reasonable and possible
- Destroy or delete personal information once there is no longer a legal or business need for us to retain it
- Maintain secure, password protected and industry standard systems such as Salesforce, Microsoft and Google to ensure the security of your information.

We also take reasonable precautions to ensure that any information you provide to us through our websites is transferred securely from our servers to our computers systems, including by means of Secure Sockets Layer (SSL) protocols.

Other information protection measures we take include:

- information protection measures];
- computer and network security measures including use of firewalls, password access and secure servers;
- restricting access to your personal information to personnel and those acting on our behalf who are authorised and on a 'need to know' basis;
- entering into confidentiality agreements with staff and third parties.

All personal information collected by us through our platforms listed is stored in a variety of formats including electronically in databases, in hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices. We will not store personal information for longer than necessary (or than we are legally allowed to) and when it is no longer required it will be deleted from the database. We may store information in 'the cloud' which may mean that it resides on servers situated outside of Australia.

However, no data protection and security measures are completely secure. Despite all the measures we have put in place, we cannot guarantee the security of your information, particularly in relation to transmissions over the internet.

Accordingly, any information which you transmit to us is transmitted at your own risk. You must take care to ensure you protect your information (for example, by protecting your usernames and passwords, customer details, etc) and you should notify us as soon as possible after you become aware of any security breaches.

If we become aware of any security breaches, an internal process will be undertaken in accordance with our data breach response plan to conduct an assessment of the breach, and commence notification procedures, if necessary.

## **7. Accessing your information**

You can access your information by sending an email request to [blessedtoblessaustralia@gmail.com](mailto:blessedtoblessaustralia@gmail.com). Occasionally we may need to say no, for example, where granting you access would infringe on someone else's privacy or in some exceptional circumstances provided by law, or where providing such access would be unreasonably burdensome or expensive in the circumstances.

When you request access, we will ask you to provide some form of identification (such as a driver's license or passport) so we can make sure that you are the person to whom the information relates.

If at any time you want to know what personal information we hold about you, please contact us.

## **8. Accuracy of your information**

If you believe that information we hold about you is incorrect or out of date please contact us by emailing [blessedtoblessaustralia@gmail.com](mailto:blessedtoblessaustralia@gmail.com) and we will try to resolve those concerns within 30 days.

We will periodically make contact with you to ensure that the information we hold about you is accurate and up to date.

## **9. Compliance with Australian Privacy Principles (APP's)**

If you believe that your private information is not collected, used, stored or disclosed in compliance with the APP's or you wish to have your personal information deleted, please contact us by emailing [blessedtoblessaustralia@gmail.com](mailto:blessedtoblessaustralia@gmail.com).

We will take all reasonable steps to address your concerns, however, we may need to retain some of your private information for legal, auditing, or internal risk management reasons.

If we become aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to ensure ongoing compliance with the APP's and any other governing legislation. If you have any further queries relating to our privacy policy, or you have a problem or complaint, please contact us by email [blessedtoblessaustralia@gmail.com](mailto:blessedtoblessaustralia@gmail.com). We will respond within 30 days.

## **10. Providing Access and Changing this privacy policy**

You can access our Privacy Policy from our website <https://zambiaschild.ngo> at any time. If you are unable to access our privacy policy and would like a copy, please email us at [blessedtoblessaustralia@gmail.com](mailto:blessedtoblessaustralia@gmail.com) and we will respond to your request within 30 days. We may make changes to this policy from time to time without notice. Any changes will be compliant with governing Privacy Law and reflected on this page.