



Our Community Foundation (GiveNow) Privacy Policy

1 Overview

- 1.1 Our Community Foundation is required by law to have a clearly expressed and up-to-date privacy policy about how we manage personal information. This Privacy Policy (**Policy**) explains how Our Community Foundation (ABN 72 102 593 484) collects and handles your personal information.
- 1.2 Our Community Foundation is committed to protecting your privacy. Establishing a trusting relationship with our users is central to our work practices. We take our obligations under Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (**Privacy Act**) very seriously.
- 1.3 This Policy may be updated from time to time in accordance with legislative or operational changes. If you would like a free copy sent to you or you have comments or questions regarding this Policy, please contact us using the details provided in paragraph 13.1.

2 Types of information we collect

- 2.1 The type of information that we collect and hold will depend on the nature of a person's involvement with us.
- 2.2 For the purposes of this Policy 'personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not (**personal information**).
- 2.3 'Sensitive information' is a special category of personal information. Sensitive information means:
 - (a) information or an opinion about an individual's (i) racial or ethnic origin, (ii) political opinions, (iii) membership of a political association, (iv) religious beliefs or affiliations, (v) philosophical beliefs, (vi) membership of a professional or trade association, (vii) membership of a trade union, (viii) sexual orientation or practices, (ix) criminal record, that is also personal information;
 - (b) health information about an individual,

- (c) genetic information about an individual that is not otherwise health information;
 - (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or
 - (e) biometric templates.
- 2.4 We will only collect your personal information where it is reasonably necessary for us to pursue one or more of our functions or activities or where we are required to by law.
- 2.5 Depending on the reason for collecting the personal information, the personal information we collect may include (but is not limited to):
- (a) your name and contact details;
 - (b) copies of identification documentation;
 - (c) payment type information (but not details of the credit card or bank accounts used in the payments – this is held by the bank only.);
 - (d) personal information contained in forms or applications;
 - (e) personal information contained in queries, or feedback about our services; and
 - (f) usage data, which may include your IP address, the pages you have clicked through on our websites, websites that referred you to our sites, information about the device you are using and your wider geographic location.
- 2.6 In some circumstances, we will collect sensitive information which requires a higher level of protection under the Privacy Act. Our Community Foundation works hard to limit how much sensitive information is collected and we will only collect your sensitive information when we have your consent and the collection is reasonably necessary for us to pursue one or more of our functions or activities.

3 How we collect information

- 3.1 Our Community Foundation will endeavour to only ask you for personal information that is reasonably necessary for the activities that you are seeking to be involved in.
- 3.2 We will only collect your personal information by lawful and fair means and will collect your personal information directly from you, unless it is unreasonable or impracticable to do so.
- 3.3 We may collect personal information from third parties such as agents, contractors, subcontractors, employees, representatives, users of Our Community Foundation's services, websites, and volunteers.
- 3.4 Our Community Foundation will wherever practicable collect personal information directly from the individual including by telephone, by letter, by email, through forms on our websites.
- 3.5 We collect user data through log files and cookies. You can block or delete cookies and still use our services, although if you do, you will be asked for your email address and password every time you log into an account you hold with us.
- 3.6 Our Community Foundation will generally obtain consent from the owner of personal information to collect their personal information. Consent will usually be provided in writing however sometimes it may be provided orally or may be implied through a person's conduct.

- 3.7 You are not required to provide your personal information and/or sensitive information if we ask for it, however if you choose not to provide information as requested, it may not be practicable for us to service your needs.
- 3.8 You are free to browse our sites anonymously. However, when you are registering for one of our services or completing a donation transaction, we require you to register an account using your name or a pseudonym (except when making a donation) and provide a valid email address. All transactions are tokenised. It is impractical for Our Community Foundation to manage and provide support if we cannot match you to your account. Receipts (especially tax deductible receipts) will be invalid unless accurate information, including your real name, is provided.

4 Information we collect on behalf of others

- 4.1 If you complete the application process for your organisation to collect funds via Our Community Foundation, the subsequent OrgHQ account on behalf of an organisation, your name, email address and the organisation's banking details are passed onto our banking partner as part of our verification process.

5 How we deal with unsolicited personal information

- 5.1 If we receive your personal information from you or a third party without having asked for it, then within a reasonable time, we will determine whether the personal information is reasonably necessary for, or directly related to, our functions or activities. If we determine that the information is not reasonably necessary for, or directly related to, our functions or activities, then as soon as practicable we will either destroy the information or ensure that it is de-identified, so long as it is lawful and reasonable to do so.

6 How we use your Personal Information

- 6.1 We use your personal information for a range of purposes including:
- (a) providing you with our services;
 - (b) improving our services through quality improvement activities;
 - (c) providing information, news, offers and conducting surveys;
 - (d) conducting data science activities, explained in paragraph 8;
 - (e) helping you to access the most appropriate information and tools associated with our websites;
 - (f) providing you with support if you need technical assistance;
 - (g) processing payments;
 - (h) communicating important service-related announcements, changes to our services or policies, or password reminders;
 - (i) providing you with information about your account and newsletters that you have signed up to receive;
 - (j) answering queries and resolving complaints;
 - (k) complying with any directions from legal authorities or legislative requirements; and
 - (l) screening for or preventing potentially illegal or abusive activity.

- 6.2 We may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or:
- (a) which are permitted by law;
 - (b) for which you have provided your consent; or
 - (c) which are necessary for maintaining the reliability and security of infrastructure and services.
- 6.3 We will only use or disclose your personal information for the above purposes, for purposes that you consent to, and other related purposes that you would reasonably anticipate.
- 6.4 To the extent you submit content to public areas of our websites (for example, on an online forum), it will be available to the public and Our Community Foundation may reuse or republish such information at our discretion.
- 6.5 If you have any concerns about us using your personal information in any of these ways, please notify us immediately.

7 Third-party service providers

- 7.1 Our Community Foundation discloses some personal information to third-party service providers (including but not limited to the providers set out in the attached appendix), who may store information inside or outside Australia. We have selected reputable third-party service providers on the basis of their published Privacy policies. We take all reasonable steps to ensure that the overseas recipient does not breach the APPs.

8 Direct marketing

- 8.1 We will only use your personal information to let you know about our products or services where we have your consent, or where we are otherwise permitted by law to do so. We may contact you for these purposes in a variety of ways, including by mail, email, SMS or telephone.
- 8.2 We do not sell your personal information to any third party for the purposes of direct marketing.
- 8.3 Where you have consented to receiving marketing communications from us, your consent will remain current until you advise us otherwise. You can opt out at any time, by:
- (a) contacting us as set out in paragraph 13.1;
 - (b) advising us if you receive a marketing call that you no longer wish to receive; or
 - (c) using the unsubscribe facility that we include in our commercial electronic messages (such as emails and SMS) to opt out of receiving those messages.
- 8.4 We will not use your sensitive information (refer to paragraph 2.3) for the purposes of direct marketing.

9 Data science

- 9.1 Our Community Foundation's overriding objective is to build stronger communities through stronger community organisations. We manage a comprehensive set of data collected through the website and we use data science to derive meaning from this data. Our

ground-breaking data initiatives are underpinned by our mission to create social value and drive a shift toward evidence-based practices and decision-making.

- 9.2 Where we engage third parties to conduct data science activities, the data is either aggregated or de-identified first, or the third party is subject to our information handling procedures described in paragraph 10.
- 9.3 We may communicate the results of data science to the public (for example, on our public websites or through social or mainstream media) or through channels where we charge a fee (e.g. our conferences or subscription-based websites). We do not disclose information that personally identifies you or your organisation in these results.
- 9.4 We may provide additional features in our products based on data science. For example, we may display benchmarks based on aggregated information across multiple entities. These features do not disclose information that personally identifies you.
- 9.5 Data science may be used to identify improvements to our products and services.
- 9.6 Use of your data as an input to our data science activities is on an opt-out basis:
- (a) You can opt out at any time, by contacting us as set out in paragraph 13.1.
 - (b) Unless you have opted out, you consent to us using your current and historical information in our data science activities.
 - (c) Our Community Foundation is not obliged to exclude your data from any results generated prior to you opting out.
 - (d) Some services and product features may not be available to you if you choose to opt out.

10 How we store and handle your data

- 10.1 We hold personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists, and in paper files held in secure drawers and cabinets.
- 10.2 We take reasonable steps to:
- (a) make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant;
 - (b) protect the personal information that we hold from misuse, interference and loss and from unauthorised access, destruction, use, modification or disclosure; and
 - (c) destroy or permanently de-identify personal information that is no longer needed for any purpose for which the information may be used or disclosed under this Policy (we may keep some information for a number of months or years to comply with contractual, regulatory or legal requirements).
- 10.3 Any personal information provided to you through your online account(s) with Our Community Foundation is password-protected to provide additional security.
- (a) We ask that you do not reveal or share your password with anyone.
 - (b) Your password is encrypted and cannot be accessed by anyone at Our Community Foundation.
 - (c) Our Community Foundation will never ask for your password, either verbally or through phone or email contact (whether initiated by you or us).

11 Accessing and correcting your personal information

- 11.1 Our Community Foundation is committed to holding personal information that is accurate, up-to-date, complete, relevant and not misleading.
- 11.2 If you believe that information we hold about you is incorrect or out of date, please contact us in writing via email and we will take all reasonable steps to amend the information in line with your request.
- 11.3 If you would like to access your personal information, you can request to do so in writing via email. We will allow you to access your personal information unless there is a sound reason not to, including:
- (a) giving access would have an unreasonable impact on the privacy of other individuals; or
 - (b) your request for access is frivolous or vexatious.
- 11.4 Should we refuse to provide you with access to your information, we will provide you with notice setting out the reasons for our refusal.
- 11.5 Our Community Foundation will destroy or de-identify any personal information which we no longer require for any purpose, unless we are required by law or a court order to retain it.

12 Complaints

- 12.1 If you have a complaint about how we have collected or handled your personal information please contact us using the contact details below. We will endeavour to respond to your complaint within 30 days of receiving it, and treat any claims of privacy breaches seriously.
- 12.2 If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commissioner toll free on 1300 363 992.

13 How you can contact us

- 13.1 Please contact us if you have any queries about the personal information that we hold about you or the way we handle that personal information. Our contact details are set out below:
- (a) Call us on (+61) 03 9320 6848
 - (b) Email us on service@givenow.com.au
 - (c) Send a letter to us at:
Attn: Privacy Officer
Our Community Foundation
PO Box 354
North Melbourne VIC 3051
Australia

14 Appendix: Third-party service providers

Provider	Product	Location	Purpose	Data Disclosed	Used By
Anchor	Managed Hosting	Australia	Managed hosting for GiveNow	<ul style="list-style-type: none"> All customer data Any additional information included in files uploaded into GiveNow 	<ul style="list-style-type: none"> GiveNow Our Community SmartyGrants
Westpac Bank	Payment Gateway	Australia	GiveNow payment gateway used for all online & regular transactions as well as remittance process	<ul style="list-style-type: none"> Donor name Donor email Organisation name Organisation Bank Account 	<ul style="list-style-type: none"> GiveNow
Campaign Monitor	Campaign Monitor		Marketing and notification purposes		<ul style="list-style-type: none"> GiveNow Our Community
Consumer & Business Services SA	-	Australia	We provide a file on financial yearly basis including all SA organisation on GiveNow	<ul style="list-style-type: none"> Organisation Name Cause Name Total donation & fee amounts 	<ul style="list-style-type: none"> GiveNow
New Relic	Application Performance Monitoring (APM)	USA	An application and service monitoring tool that provides us with real-time information about the health and performance of our online services	<ul style="list-style-type: none"> Record identifiers present in URLs (e.g. program ID, application ID) Limited application process information since OC and GiveNow use free version of New Relic 	<ul style="list-style-type: none"> GiveNow Our Community SmartyGrants
Australian Business Register	Business Register Lookup	Australia	A lookup service that returns information about your organisation based on your ABN	<ul style="list-style-type: none"> ABN 	<ul style="list-style-type: none"> GiveNow SmartyGrants