

Privacy Policy

Evangelical Free Church of Australia Inc (ABN 19 452 290 664) (“our”, “we”, or “us”) is committed to protecting the privacy of personal information which we collect in compliance with applicable obligations under the *Privacy Act 1988* (Cth) (**Privacy Act**). In this policy, **personal information** and **sensitive information** have the same meanings as under the Privacy Act.

This Privacy Policy outlines our commitment to you about how we manage the personal information and sensitive information we may hold about you; and is to be read subject to any overriding provisions of law or contract.

We collect your personal information for the primary purpose of providing our services to you, as a church and an ACNC registered charity. We may also use your personal information for secondary purposes closely related to the primary purpose and in circumstances where you would reasonably expect such use or disclosure.

When we collect personal information, we will, where appropriate and where practicable, explain why we are collecting the information and how we plan to use it.

This privacy policy was approved by the Deacons Board and last updated on 16-Jun-2024.

Scope

This policy currently only applies to the information managed by our Church Management System - this refers to the processes, procedures and mechanisms (manual or software based, on-premises or cloud-based) used by the church to manage its operations such as church attendees’ details, church resources, events, and communication.

We intend that this policy will, in future, cover the whole church, including all official groups operated by us, such as cell groups, fellowships, kids church, adult education, etc. We are in the early stage of implementing this policy across the whole church. We recognise that in a church of our size with multitude of different groups, there are varied practices and opinions, hence it will take time to fully adopt this policy across the whole church. We do encourage everyone to follow this policy as soon as they are able.

What information do we collect

The kinds of personal information we may collect include but are not limited to:

- full name;
- personal contact details (e.g. address, mobile numbers, e-mail address);
- date of birth;
- ministry experience;
- educations and qualifications;
- correspondence between you and us; and

- other personal information provided to us when you make an inquiry, request information, correspond with us, lodge a complaint or otherwise interact with us.

Personal information of children

We respect the privacy of children and does not knowingly collect, use or disclose personal information of children under 16 years of age without explicit consent from a parent or guardian.

If we become aware that we possess personal information of children that lacks consent from a parent or guardian, we will promptly delete such personal information.

If a parent or guardian wishes to raise a concern regarding personal information pertaining to a child, please email our office - lindfieldoffice@efca.org.au.

Other information we collect

We do not generally collect sensitive information unless it is relevant, permitted by law and we have your prior consent.

Some information may be collected automatically in relation to your visits to our website. Such information does not identify you personally. It provides us with data about how you use the website and engage with us. We use this information to improve our services and make them more useful to you. The information we collect includes some or all of the following:

- **Site visit information**

We collect general information about your visit to our website. The information we collect is not used to personally identify you, and includes: your IP address, internet service provider, browser type and language, referring and exit pages and URLs, date and time, which pages you visit and the amount of time spent on particular pages, the links you click while on the website, search terms, operating system, general geographic location, and if visiting the mobile site technical information about your mobile device. This information is aggregated and used for the purposes of system administration, and to analyse statistics on the use of our website.

- **Cookies**

Cookies are small data files which may be stored on your computer when you connect to our website. This will enable our server to collect certain information from your web browser. Cookies and other similar technology make it easier for you to log on and view our website on future visits. It also allows monitoring of website traffic and to identify your computer when you visit our website. Allowing us to create a cookie does not give us access to the rest of your computer and we will not use cookies to track your online activity once you leave our site. Cookies are read only by the server that placed them and are unable to execute code or viruses.

You can change the privacy settings of your browser; in particular, you can refuse all cookies or opt to be notified each time a cookie is sent to your computer. By blocking or deleting cookies used on our website, it may limit the functionalities available to you.

- **Google analytics**

In addition to web server logs, we may use Google Analytics, a web analytics service provided by Google Inc. (Google). Google Analytics collects information anonymously using cookies and JavaScript. It reports website trends without identifying individual visitors.

By using this website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

How we collect information

We generally collect personal information directly from you, either in person (e.g. when you fill in a paper form), or electronically (e.g. via our website, email, online forms, etc). It may also be collected from fellowships, cell groups or other official groups that you belong or have provided personal information to. (For clarity, official groups are groups established by the Deacons Board or ministry team, as such they are part of the church so when you provide information to such groups, you are providing information to the church.)

Third parties

In some circumstances we may be provided with information by third parties where it is unreasonable or impracticable to collect the personal information directly from you.

Our website may contain links to third parties' websites, services or applications (e.g. YouTube, Elvanto) in order to enable certain functionalities and to provide you with our services. Whilst we take all reasonable care to assure ourselves that these third parties are reputable, we have no control over and are not responsible for these third parties, including their privacy policy.

What we do with the information we collect

We collect, use and disclose your personal information to carry out our activities, operations and to provide the services of our church. This includes:

- communicate with you;
- administer, support, improve and develop our activities, operations and services;
- facilitates the pastoral care of church attendees;
- satisfy compliance requirements of an incorporated association and ACNC registered charity (e.g. to maintain an accurate membership register);
- update and improve our website;

- take any action we are required or authorised by law to take.

Whom do we disclose your personal information

During our ordinary operation, we may disclose your personal information to:

- church staffs;
- ministry leaders;
- service providers (such as contractors who provide website, IT, administration, accounting and other services to support us);
- suppliers we engage for data processing and other administrative and support functions;
- professional advisers (for example, our insurers, auditors, lawyers, accountants and consultants);
- any entity to whom we are required or authorised by law to disclose your personal information (e.g. law enforcement agencies and government and regulatory authorities); and
- with your consent (express or implied), other entities.

We do not sell, licence or otherwise receive any financial benefits from your personal information.

We do not, generally, disclose your personal information to recipients outside of Australia. If we do so, for example, where a cloud service provider creates a backup of our data and stores that backup overseas, we will take reasonable steps to ensure that your personal information is handled by any overseas recipients in accordance with the Privacy Act and our instructions for the purposes described above. Any such backups of the data may be held in the United States of America, Canada, Singapore, New Zealand, the UK or within the European Economic Area. By providing us with your personal information, you consent to this disclosure of your personal information.

How we store your personal information

Your personal information is stored in a manner that reasonably protects it from misuse, loss, unauthorised access, modification or disclosure. We may store your personal information in different forms, including hardcopy and electronic form, and in different locations, including our office and cloud storage.

We adopt best practices to keep your personal information secure. In particular, where personal information is stored in a cloud-based service (e.g. the Elvanto church management system), our policy is to only store information that we reasonably need to for the proper functioning of the church management system. Importantly, we will minimize the cloud-based storage of certain personal information that is more likely to be abused if access by unauthorized parties.

When your personal information is no longer relevant for the purpose for which it was collected, we will take reasonable steps to destroy or permanently de-identify your personal information. However, we may be required by law to retain your personal information after your relationship

with us has expired. Most of the personal information is stored in secure files which will be kept by us for a minimum of 7 years.

Access to your personal information

You can request access to the personal information we hold about you by contacting us using the email address provided below. We will respond to a request for access within a reasonable period after the request is made, either by giving you access to the personal information you are entitled to access, or by notifying you of our refusal to give access. We may request to verify your identity before responding to any request.

We will not charge you a fee for making a request to access the personal information we hold about you or for making any corrections to your personal information, unless the request is excessive.

Correcting personal information

You can request to update or correct your personal information if you believe that the personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading or otherwise needs to be corrected or updated. You can do this through our email address provided below. We will respond to a request to correct your personal information within a reasonable period after the request is made.

To effectively communicate with you, it is important the personal information we hold about you is complete, accurate and current. At any time while we hold your personal information, we may ask you to update your personal information.

Policy updates

This privacy policy may change periodically. The most recent version is the one published online. You can also request the current version from the church office.

Privacy policy enquiries and complaints

If you wish to contact us regarding our handling of your personal information or any of the matters covered in this Privacy Policy, please contact us at lindfieldoffice@efca.org.au.

If you are not satisfied with how your complaint is handled by us, then you can lodge a formal complaint with the Office of the Australian Information Commissioner at:

Telephone: 1300 363 992

Post: Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001

Email: enquiries@oaic.gov.au

Other options: <https://www.oaic.gov.au/contact-us>