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| <u>Policy Approver:</u> | Board |
| <u>Policy Owner:</u> | Chief Executive Officer |
| <u>Policy Lead:</u> | Privacy Officer |

Privacy Policy

This policy describes how we collect, hold, use, disclose and maintain the quality and security of personal information.

1 Introduction

- (a) This policy sets out our commitment to protect the privacy of individuals we interact with. It covers how we collect, hold, use and disclose personal information, and how we maintain the quality and security of personal information.
- (b) This policy provides a guide for our personnel on what to do if there is actual or suspected non-compliance.

2 Scope of the Policy

This policy applies to all our personnel (being our directors¹, employees, interns, students on vocational placement, volunteers and independent contractors and consultants).

3 Policy Statement

- (a) We respect and are committed to protecting the personal information of all individuals we interact with.
- (b) We:
 - (i) are transparent about the personal information we collect and why it is collected;
 - (ii) only collect, use and disclose personal information if necessary to perform our functions or activities;
 - (iii) take reasonable steps to keep personal information secure; and
 - (iv) conduct activities in accordance with this policy and appropriate procedures.
- (c) We are committed to sharing information about how we protect the personal information of all individuals we interact with in a clear and easily understandable way in appropriate forms and through appropriate media. For this purpose, we have developed a Privacy Policy Statement that we will ensure is readily accessible on our website. This Privacy Policy Statement is also annexed to this policy as Annexure A.
- (d) Our Privacy Policy Statement describes in detail how we collect, hold, use and disclose personal information and how we maintain its quality and security. All

¹ If our Board has adopted a separate policy regarding the subject matter of this policy, then that policy takes precedence with respect to our directors.



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our personnel are required to comply with this policy as well as the Privacy Policy Statement.

- (e) We will ensure that our personnel are equipped to understand and implement this policy and the Privacy Policy Statement.
- (f) We are committed to ensuring that privacy complaints are treated fairly, promptly and with due confidentiality.
- (g) Compliance with this policy, the Privacy Policy Statement and the law are conditions of working or undertaking any form of business with or for us. Any breach of this policy is a serious matter that may compromise our status as a charity and/or our funding for our work. A breach of this policy may result in disciplinary action (including dismissal) and/or termination of a partnership or an agreement.

4 Policy in Practice

4.1 What we mean in this policy

In this policy:

- (a) By “**personal information**” we mean any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable.
- (b) By “**reportable incident**” we mean any actual, likely or suspected breach of this policy or the privacy statement.

4.2 Responsibilities

- (a) **Policy Approver:** accountable for approving this policy and the Privacy Policy Statement, including approving after formal reviews.
- (b) **Policy Owner:**
 - (i) accountable to the Policy Approver for overseeing the implementation and overall compliance with this policy and the Privacy Policy Statement;
 - (ii) ensures this policy and the Privacy Policy Statement is regularly reviewed (at least every two years or earlier if warranted); and
 - (iii) delegates the implementation, training, maintenance and monitoring of this framework to the Policy Lead.
- (c) **Executive team:** responsible for role modelling behaviour consistent with this policy.



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(d) **Policy Lead:**

- (i) responsible for the implementation, maintenance and monitoring of the policy and the Privacy Policy Statement at an organisational level, including through appropriate procedures, training and reporting;
 - (ii) supports the Policy Owner to review this policy and the Privacy Policy Statement; and
 - (iii) manages risk and compliance issues related to this policy and the Privacy Policy Statement.
- (e) **All of our personnel:** must be familiar with, comply with and implement this policy and the Privacy Policy Statement and manage privacy risks.
- (f) Detailed responsibilities can be found in our Policy Lifecycle Stages, Roles and Responsibilities (see Annexure A to the Policy Governance Framework).

5 Reportable incidents and complaints

5.1 Reportable incidents

If any personnel have reasonable grounds to suspect that a reportable incident has taken place, may be taking place or could be taking place, they must report it as soon as practicable to the Policy Lead and comply with their directions. The Policy Lead must ensure that the report is promptly and appropriately investigated.

5.2 Privacy complaints

Privacy complaints will be dealt with in accordance with the Complaints Handling Policy and relevant procedures.

6 Availability of this policy

We will ensure that the Privacy Policy Statement is available to download on our website and this policy is available to download on our intranet.

7 Relevant laws

- *Privacy Act 1988* (Cth)

8 Related policies

- (a) Data Breach Management Policy
- (b) Speak Up Policy
- (c) Complaints Handling Policy



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9 Revision History

| Action: | Date of Board meeting: |
|--|-------------------------------|
| Approval and adoption of policy by the Policy Approver | 31 October 2023 |
| Revision | [insert] |



Annexure A – Privacy Policy Statement

WWF-Australia values and respects the privacy of the people we deal with. WWF-Australia is committed to protecting your privacy and complying with the *Privacy Act 1988* (Cth) (**Privacy Act**) and other applicable privacy laws and regulations.

This Privacy Policy Statement describes how we collect, hold, use and disclose your personal information, and how we maintain the quality and security of your personal information. It is published on our website.

What is personal information?

“Personal information” means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g. your name) or indirectly.

What personal information do we collect?

The personal information we collect about you depends on the nature of your dealings with us or what you choose to share with us.

The personal information we collect about you may include:

- Your name, postal address, telephone number and/or email address, along with your preferences as to when and how we should contact you in the future.
- Financial information which you give to us, such as credit card details.
- Information you enter on our website forms.
- Records of your donation history and correspondence and campaign actions taken with us.
- Images, photographs or videos if you take part in an event with us.
- Details of the pages you visit on our website, including technical information such as the IP address and location you use to access the website, your browser type and version.
- Any other details in which you give us including your reasons for supporting us.



We might also obtain personal data about individuals who may be interested in giving gifts to organisations like ours. In these limited cases only, in addition to information you give us directly, we may also collect information about you from publicly available sources.

WWF-Australia does not generally collect sensitive information about you (e.g. information or opinion about your racial or ethnic origin, political opinions, political association, religious or philosophical beliefs, membership of a trade union or other professional body, sexual orientation or practices, criminal record, health information, genetic information, biometric information or biometric templates). If we need to record or hold your sensitive information, we will do so only with your consent or as otherwise required or authorised by law, and we will take appropriate measures to protect the security of this information.

You do not have to provide us with your personal information. Where possible, we will give you the option to interact with us anonymously or by using a pseudonym. However, if you choose to deal with us in this way or choose not to provide us with your personal information, we may not be able to provide you with our services or otherwise interact with you.

How do we collect your personal information?

We collect your personal information directly from you when you:

- Become or express an interest in becoming, a financial supporter of WWF-Australia by:
 - making a donation
 - purchasing a virtual gift or other product from our store
 - setting up a symbolic adoption or regular gift
 - making a bequest or pledging to leave us a gift in your Will.
- Become or express an interest in becoming, a non-financial supporter of WWF-Australia by:
 - registering to attend an event
 - registering to volunteer with us
 - enter information on a form hosted by a third party platform, for example on Facebook or Instagram.
- Subscribing to our e-newsletters or requesting information or contact from us.



- Signing an advocacy petition or becoming involved with one of our campaigns.
- Participating in or responding to any survey we conduct.
- Visiting any of our websites, mobile apps or social media pages contributing or providing personal information, including by making comments on our message boards or discussion forums.
- Applying for a job or consultancy with us.
- Contacting us or interacting with us in any other way than as stated above.

Collecting personal information from third parties

We may also collect your personal information from third parties or through publicly available sources, for example:

- When you disclose personal information on social media such as Facebook, Twitter, LinkedIn, Instagram, TikTok or Pinterest.
- Newspaper articles.
- Sources that provide market research data, geo-demographic information, measures of affluence and similar information.

We collect your personal information to create a profile of your interests and preferences and/or to better understand the background and motivations of the people who do or may support us, so that we can deliver a more targeted and relevant supporter experience.

How do we use your personal information?

We use personal information for many purposes in connection with our functions and activities, including the following purposes:

- Providing you with the services, products or information you have purchased or requested.
- Keeping you up to date with the work you are supporting and the latest conservation news and sending you materials, including on fundraising, campaigning and events.
- Keeping a record of your relationship with us.
- Administering your donation(s).
- Asking for financial and non-financial support.



- Managing your communication preferences, including marketing preferences.
- Understanding how we can improve our programs, services, products or information.
- Carrying out our obligations arising from any contracts entered into by you and us.
- Sending you tailored communications and displaying relevant adverts we think will be of interest to you.
- In limited circumstances, analysing the personal information we collect about you and using publicly available information to better understand your interests, preferences and level of potential donations so that we can contact you more effectively and be better prepared in circumstances when we may meet with you.

Disclosure of personal information to third parties

We may disclose your personal information to third parties in accordance with this Statement in circumstances where you would reasonably expect us to disclose your information.

For example, we may disclose your personal information to:

- our third party service providers (for example, our IT providers and payment processing providers);
- our marketing providers;
- our professional services advisors.

In these cases, we ensure that we have a contract with the provider and as part of that agreement the provider agrees to respect the security of your personal information and to treat it in accordance with the law. We only permit providers to process your personal data for specified purposes and in accordance with our instructions, which include deleting it after it has been used for the specified purpose(s).

We may also be required to disclose your personal information to government bodies or in connection with legal proceedings. In these circumstances, we will only disclose your personal information to the extent it is required by law.

We may disclose your personal information to third parties for the purposes of advertising, including online behavioural advertising, website personalisation, and to provide targeted or retargeted advertising content to you (including through third party websites).



Transfer of personal information overseas

WWF-Australia is part of the global WWF network. In some circumstances, we may need to disclose personal information to another WWF office overseas and will ensure we comply with any relevant international laws.

Where we disclose your personal information to third parties overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are maintained. We will only disclose to overseas third parties if:

- you have given us your consent to disclose personal information to that third party; or
- we reasonably believe that:
 - the overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the Australian Privacy Principles under the Privacy Act; and
 - the law or binding scheme can be enforced; or
- the disclosure is required or authorised by an Australian law or court / tribunal order.

How do we protect your personal information?

WWF-Australia will take reasonable steps to ensure that the personal information that we hold about you is kept confidential and secure, including by:

- having a robust physical security of our premises and databases / records;
- taking measures to restrict access to only personnel who need that personal information to effectively provide services to you;
- having robust cybersecurity and technological measures in place (for example, anti-virus software, firewalls);
- storing your information on secure servers in controlled facilities; and
- using security encrypted response forms on our websites when personal and financial details are requested.

Online activity

Cookies



The WWF-Australia website uses cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it. These cookies recognise when your device has visited our website(s) before, so we can distinguish you from other users of the website. This improves your experience and the WWF-Australia website(s).

We do not use cookies to identify you, just to improve your experience on our website(s). If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

Website analytics

Our website uses tracking technologies to help us better understand visitor traffic, so we can improve our services. Although this data is mostly anonymous, it is possible that under certain circumstances, we may connect it to you.

Direct marketing

We may send you direct marketing communications and information about our work, opportunities, or events that we consider may be of interest to you if you have requested or consented to receive such communications. These communications may be sent in various forms, including mail, SMS and email, in accordance with applicable marketing laws, such as the *Australian Spam Act 2003* (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may opt-out of receiving marketing communications from us at any time by following the instructions to "unsubscribe" set out in the relevant communication and/or contacting us using the details set out in the "How to contact us" section below.



Retention of personal information

We are committed to not retaining your personal information for longer than we need to. In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to keep your personal information to comply with applicable laws, for example record-keeping obligations, or for other legitimate business reasons.

How to access and correct your personal information

We will endeavour to keep your personal information accurate, complete and up to date.

If you wish to make a request to access and / or correct the personal information we hold about you, you can make a request by contacting us using the details set out in the “How to contact us” section below and we will usually respond within 2 days. You can also request for us to delete your personal information and we will endeavour to do so unless we are required to retain your personal information to comply with applicable laws, for example record-keeping obligations.

Links to third party sites

WWF-Australia website(s) may contain links to websites operated by third parties. If you access a third party website through our website(s), personal information may be collected by that third party website. We make no representations or warranties in relation to the privacy practices of any third party provider or website and we are not responsible for the privacy policies or the content of any third party provider or website. Third party providers / websites are responsible for informing you about their own privacy practices and we encourage you to read their privacy policies.

Inquiries and complaints

For complaints about how WWF-Australia handles, processes or manages your personal information, please contact us using the details set out in the “How to contact us” section below. Note we may require proof of your identity and full details of your request before we can process your complaint.



Please allow up to 2 days for WWF-Australia to acknowledge your complaint and approximately 30 business days to address the complaint. Depending on the circumstances, we may need longer to address your complaint but if we do we will keep you updated.

It will not always be possible to resolve a complaint to everyone's satisfaction. If you are not satisfied with WWF-Australia's response to a complaint, you have the right to contact the Office of Australian Information Commissioner (at www.oaic.gov.au/) to lodge a complaint.

How to contact us

If you have a question or concern in relation to our handling of your personal information or this Statement, you can contact us for assistance as follows:

Email

enquiries@wwf.org.au
Australia)

Contact number

1800 032 551 (+61 2 8000 0303 from outside of