



The Catenian Association

Australian Privacy Policy

approved by the Australian National Council

October 23, 2019

Throughout this policy the term Province includes Areas, and similarly Circles includes Groups wherever appropriate

The Catenian Association is committed to upholding the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth). This Privacy Policy sets out how we collect, use, store, manage and disclose your personal information and protect your privacy.

By providing personal information to us, you consent to our collection, use, storage, management and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

1. Definitions

For the purpose of this Privacy Policy,

"Catenian Association Australia", "we", "our" and "us" mean the Australian National Council of the Catenian Association (ABN 30 775 683 220) and those Catenian Provinces and Circles located in Australia.

"our website" mean www.thecatenians.org.au.

"personal information" has the same meaning as defined in the Privacy Act, and generally means any information about you that identifies you or from which your identity reasonably can be determined.

"Privacy Act" means the *Privacy Act 1988* (Cth),

2. Why do we collect personal information?

We collect personal information from you when it is reasonably necessary to enable us to provide you with the products, services, programs or information that we supply, and for secondary purposes for which you reasonably expect us to use or disclose your personal information. The reasons we collect personal information include:

- enabling you to access and use our website;
- operating, protecting, improving and optimising our website, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing purposes;
- sending you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- developing or evaluating our activities, services and programs to better achieve our objects and values;

- keeping our members and supporters informed as to our activities, programs and services in different ways, for example, by way of newsletters, social media etc;
- responding to queries or comments from the public;
- managing our business, including our website; and
- complying with our legal obligations, resolving any disputes that we may have with any of our users and enforcing our agreements with third parties.

3. What kinds of personal information do we collect?

The type of personal information we may collect and hold varies depending on the purpose for which it is collected (see above). This may include your first name, last name, location, age, phone number, email address, postal address and payment details that you have provided when interacting with us. We may also collect information on when and how you have participated in our activities or used our services and programs, how you use our website, your product preferences, opinions and other personal preferences. Other information that may be automatically collected when you visit our website include (without limitation) your Internet Service Provider (ISP), operating system, browser information, Internet Protocol (IP) address or other device identifiers, location and time/date stamp. You can always 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.

4. How do we collect your personal information?

We collect information from you in different ways. Our usual practice is to collect personal information directly from you. For example, you might:

- fill out a form, subscribe to our newsletter, sign up or create a login to our website;
- correspond with us via social media messages or conversation;
- participate in one of our online services and programs in which you give your personal information to us online, or to one of our representatives in person or on the phone; or
- participate in one of our off-line services and programs in which you will give your personal information to one of our representatives in person.

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.

At or around the time your personal information is collected, we will take reasonable steps to bring this Privacy Policy to your attention. Generally, however, having made you aware of our Privacy Policy, we will assume that you have read and agree to the terms of the Privacy Policy unless you inform us of any specific objections or your non-consent in writing.

At times, we may also collect personal information from a third party or from a publicly available source, but only if you have consented to your information being used in this way, or would reasonably expect us to collect it in this way. We only collect this information from companies or sources that are allowed to disclose it to us.

We will take reasonable steps to make sure you know we have your personal information, how we got it and how we'll handle it.

5. How do we use cookies and other digital identifiers?

Our website uses cookies and other digital identifiers. These include:

- site performance identifiers: these give us information about how our website is used. This helps us provide you with a more user-friendly experience.
- analytics cookies: we use these to gather statistics about our website, for example, to help us monitor how many users are on our website and what sections are most popular.
- advertising cookies: we use these cookies to improve our understanding of the kind of advertising that may be relevant to your aggregated segment. That way, you would receive ads that are more likely to be relevant to you.
- other cookies or digital identifiers so that when you visit third party websites, relevant advertising from the Catenian Association Australia can be displayed to your aggregated segment.

It's important to know you can clear or disable cookies or digital identifiers from your device by changing the security settings on your web browser. However, doing this might mean that parts of our website may not work as it should.

6. How do we handle your personal information?

Storage

The personal information we hold may be stored in many forms of media, including the following:

- your written correspondence to us;
- audio and/or visual data containing your personal information; and
- legal documents and information you provide to us in connection with your as a recipient of, or participant in, one of our activities, services and programs.

We may keep copies of the above documents (in physical or electronic form, at our election) as is necessary to carry out our functions and activities and provide our services and programs.

Security

We take the security of your personal information seriously and take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information, including but not limited to:

- all personal information is securely stored at all times by us or an authorised external service provider;
- we frequently use virus scanning tools;
- we use authentication methods to help protect personal information collected from misuse, unauthorised access, modification or disclosure; and
- only authorised people who need to have access to your personal information will have access to it.

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.

7. How do we use and disclose personal information?

Normally, we would use your personal information for the purposes that it was collected, for any secondary purposes directly related to that primary purposes, or to comply with our legal obligations. The personal information will be used internally within the Catenian Association Australia by its authorised officers and will also be used to contact you directly from time to time for such purposes.

If necessary to carry out our functions and activities and provide our services and programs, we may need to disclose your personal information to external service providers (such as information technology service providers, legal service providers, mailing houses, call centres, etc).

We may disclose personal information for the purposes described in this Privacy Policy to:

- our employees and related bodies corporate;
- third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products, services and programs to you);
- professional advisers, dealers and agents;
- payment systems operators (e.g. merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

We may also disclose your personal information to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us to develop anonymised consumer insights so that we can better understand your preferences and interests, personalise your experience and enhance the products, services and programs that you receive.

We will take reasonable steps to ensure that external service providers and third parties only use your personal information that we provide for the purpose(s) for which you have given us your personal information and to not share it further with another party unless it is necessary to do so.

We will never sell your information to third parties.

International disclosure

We may disclose your personal information outside of Australia to third party suppliers located in the United Kingdom, France, Ireland and the United States of America. We do not normally send your information overseas except in limited circumstances when necessary for our operation. Such circumstances may include:

- we may engage external suppliers for database support that we contract with to assist with the administration and management of our website and the Catenian Association Australia;
- we may engage contractors located overseas for the limited purposes of storing personal information (including the storage of financial information in a cloud-based accounting program) and ensuring that such information remains accessible upon demand; and
- when you communicate with us through a social network service such as Facebook or Twitter, the social network provider and its partners may collect and hold your personal information overseas.

When you provide your personal information to us, you consent to the disclosure of your information outside of Australia and acknowledge that we are not required to ensure that overseas recipients handle that personal information in compliance with the Privacy Act. We will, however, take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

Advertising and Opting Out

We may use your personal information to send you promotional or marketing material from time to time. We may send you material that we believe would be of interest to you by mail, phone, email, text, and online via the internet and in apps in accordance with the *Spam Act 2003* (Cth) and the Privacy Act unless you tell us not to.

We'll make sure that any marketing emails, texts and letters we send you clearly tell you how to opt out.

You can opt out of receiving online promotional or marketing material at any time by following the opt-out instructions on the materials you received or by contacting us via the contact details set out in this Privacy Policy.

There are some types of marketing we can't control on an individual basis, like general letterbox drops or online ads that are not targeted specifically to you.

8. How do you access your personal information?

You have a right to access your personal information held by us by contacting us via the contact details set out in this Privacy Policy.

Furthermore, as we aim to hold accurate, up-to-date and complete records of your personal information, you are encouraged to contact us to update your records should they change from time to time.

We will always confirm your identity before giving access to your personal information.

There are circumstances under the Privacy Act where we may not give you access to the personal information we hold about you. For example, we can't give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety.

There is generally no cost for accessing the personal information we hold about you, unless the request is complex or resource intensive. If there is a charge, it will be reasonable and we will let you know what it is going to be so that you can agree to it before we go ahead.

9. How do you make a complaint?

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us via the contact details set out in this Privacy Policy. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, you can lodge a complaint with the Office of the Australian Information Commissioner whose contact details are set out below:

Office of the Australian Information Commissioner

GPO Box 5218 Sydney NSW 2001

Email: enquiries@oaic.gov.au

Telephone: 1300 363 992

Fax: 02 9284 9666

10. How do you contact us?

If you need to contact us for any reason in relation to this Privacy Policy or your personal information, you can contact us by emailing privacy.officer@thecatenians.org.au.

11. How do we change this Privacy Policy?

This Privacy Policy was last updated on **October 23, 2019**

If this Privacy Policy changes, the revised Privacy Policy will be posted on our website. Please check back periodically, and especially before you provide any personal information. Your continued use of our website following any amendments to it will confirm your acceptance of such amendments.

12. Third Parties Websites and Content

Our website may contain links to websites operated and embedded content provided by third parties, such as Google Maps, YouTube videos etc. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.