



## **PRIVACY POLICY**

At The White Shadow Foundation (TWSF), we understand that part of our mission means respecting each individual we deal with and this extends to respecting and protecting Personal Information. To the extent that the Privacy Act 1988 (Privacy Act), and the Australian Privacy Principles (APPs) govern the way in which we must manage your Personal Information, this Privacy Policy sets out how we collect, use, secure, disclose and otherwise manage Personal Information about you.

### **Definitions**

“Personal Information” means information or opinions about an identified 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.

“Sensitive Information” means information or opinions about such things as an individual’s racial or ethnic origin, political opinions, membership of a political, professional or trade union body or association, religious or philosophical beliefs, sexual orientation, or criminal or medical information.

“We, us, our” means TWSF, its directors, employees, servants, and assignees.

“Website” means the following website: [whiteshadowfoundation.org](http://whiteshadowfoundation.org).

“You, your” means you, the person accessing our Website and/or making use of the services the Website provides.

### **Why do we collect Personal or Sensitive Information?**

TWSF only collects Personal Information from you that is necessary to carry out and provide its services to you. Collection of Personal Information enables us to customise settings and preferences for the next time you visit our Website.

The Personal Information we collect will depend on the services you request for us. Generally, the types of Personal Information that will be collected include:

- (a) Your name;
- (b) Your current and previous address;
- (c) Your telephone and/or mobile number;
- (d) Your facsimile number;
- (e) Your email address; and
- (f) Your credit card, or bank transfer details, and card transaction data (such as the location of the transaction, the time and date of the transaction, enhanced transaction information, and the amount of the transaction).

In addition, information may be collected through use of our digital platforms including (but not limited to):

- (g) your geographic location;
- (h) your user preferences

### **How do we collect Personal or Sensitive Information?**

Personal information about you may be collected by us through a variety of avenues, and will generally be collected from you directly (including any forms submitted to us), over the internet, via email, or through a telephone conversation with you.

The main points at which we will collect Personal Information is when you fill in one or more of our online forms, register for services online, subscribe to our mailing list, become a volunteer, engage in corporate sponsorship or make a personal donation, or otherwise provided via email, telephone or facsimile. Personal Information may also be collected us from time to time through other avenues including through contracts with third parties or goods/services suppliers, social media channels, or through other general initiatives that we may conduct. In such cases we will take all reasonable steps to ensure that you are made aware of the Personal Information that has been provided to us by the relevant third party in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected. If we receive unsolicited information about you that we do not ask for or which is not directly related to our functions or activities, we may be required to destroy or de-identify that information, provided it is lawful and reasonable to do so.

### **Failure to provide information**

If the Personal Information you provide to us is incomplete or inaccurate, we may be unable to provide you, or someone else you know, with the goods and services you, or they, are seeking. If there are any changes to your Personal Information please advise us so that we may update our records to reflect those changes. You may unsubscribe from our mailing/marketing lists at any time. To unsubscribe please contact us using the contact details provided in this Privacy Policy.

### **Internet users**

If you access our Website, we may collect additional Personal Information about you in the form of your IP address and domain name. Our Website contains links to other websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures.

### **How do we use your Personal Information?**

When we collect Personal Information we will, where appropriate and possible, explain to you why we are collecting the information and how we plan to use it. Unless we have your authorisation or are otherwise authorised by law, we will only use your Personal Information in the circumstances specified in this Privacy Policy. Unless we have your authorisation or are otherwise authorised by law, we will only use your Personal Information for the purpose it was collected for. Generally, we will collect, use, and hold your Personal Information if it is reasonably necessary for or directly related to the performance of our functions and activities. Some examples of where we would typically use your Personal Information include:

- (a) To assist you in establishing and maintaining your relationship as a sponsor, volunteer, donor, or other person associated with our cause;
- (b) To provide you, or someone else you know, with goods and services;
- (c) To administer and manage those services including correspondence and the provision of information;
- (d) To enable your credit card transactions;
- (a) To provide you with information about other goods and services that we, our related entities and other organisations that we have affiliations with, or that may be of interest to you;
- (e) To facilitate our internal business operations, including internal record keeping and the fulfilment of any legal requirements;
- (f) To research, analyse our goods and services and customer needs, with a view to developing new or improved goods and services; and
- (g) To answer any enquiries you may have.

### **How do we use your Sensitive Information?**

At your consent we may collect your sensitive information. In the event that we do, we will only use your Sensitive Information in the circumstances specified in this Privacy Policy, with your authorisation, and for the purpose that it was collected for.

### **Accessing your Personal Information**

In most cases, you can gain access to the Personal Information we hold about you subject to some exemptions available at law. If you wish to access your Personal Information please submit a written request to us and we will attend to it within a reasonable period.

TWSF will not charge any fee for your request but may charge an administration fee for the provision of a copy of your Personal Information. In order to protect your Personal Information, we may require identification from you before releasing such information. We may decline a request for access to Personal Information in circumstances prescribed by the Privacy Act, and if we do, you will be provided with reasons, in compliance with the Privacy Act (unless it would be unreasonable to provide those reasons).

If, upon receiving access to your Personal Information or at any other time, you believe the Personal Information we hold about you is inaccurate, incomplete, or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete, and up to date. If we refuse to correct your Personal Information, we will give you a written notice that sets out our reasons for our refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint. There is no fee for making any corrections to your Personal Information.

### **Disclosure of Personal Information**

We do not sell or trade your Personal Information to or with outside parties. Generally, we only use or disclose Personal Information about you for the purposes for which it was collected (as set out above). We may disclose Personal Information about you to third parties who assist us in operating our Website, conducting our business, or servicing you. We may also disclose your Personal Information to service providers who assist us in operating our business (including financial institutions, cloud data storage suppliers, IT suppliers, mail distribution service suppliers or professional advisors such as lawyers, accountants, and auditors). Where possible, we endeavour to obtain an agreement from those third parties to deal with the Personal Information in accordance with this Privacy Policy and the Privacy Act. Our service providers are not permitted to sell, use or disclose your contact details or contact you for any purpose other than the purpose for which they have received your Personal Information (unless required by law). We may also release your Personal Information when required by law or deemed as necessary to enforce our site policies, or to protect our rights, property, or safety. Anonymised and de-identified visitor information may be provided to other parties for marketing, advertising, or other uses.

### **Disclosure of Personal Information overseas**

We are assisted by a variety of external service providers to deliver our services, some of whom may be located overseas. These third parties are too numerous to list, and they change from time to time. Some examples of the types of third parties include:

- (a) website analytics providers such as Google located in the US;
- (b) app services and website domain and hosting providers such as Wix, located in the US;
- (c) third party financial transaction facilitators such as Stripe located in the US; While our developers and support staff rarely access live data, they may do so when troubleshooting complex support requests or bugs, or designing new functionality to address your feature requests; and
- (d) promotion or marketing service providers, such as Mail Chimp located in the US.

In many cases, we impose contractual restrictions equivalent to those imposed on us under the Privacy Act in respect of collection and use of Personal Information by those third parties. In some cases, such as social media networks, our ability to impose contractual restrictions is limited. In those circumstances, we will carefully consider the risks to the protection of Personal Information when entering into arrangements with third parties. Our service providers are not permitted to sell, use or disclose your contact details or contact you for any other purpose unless required by law. Under no circumstances will we sell or receive payment for licensing or disclosing your Personal Information.

### **Direct marketing**

We will never knowingly send you unsolicited commercial electronic messages. More information on the Spam Act 2003 is available from the regulator's website: <http://www.acma.gov.au/spam>. If you subscribe to our mailing list, fill in one or more of our online forms, or register for services online, we may use or disclose your Personal Information (excluding sensitive information) for direct marketing purposes.

We will obtain your specific consent to disclose sensitive information for the purposes of direct marketing our services. We may include third party offers in marketing materials we send to you. You will be able to opt-out of direct marketing at any time with no charge to you, or request us to provide you with our source of information, by email to [hello@whiteshadowfoundation.org](mailto:hello@whiteshadowfoundation.org). We will then ensure that your name is removed from our mailing list. If you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please contact us using the details provided below.

### **Security of Personal Information**

Your Personal Information is stored in a secure server or secure files located in Australia, or transferred to a server located in Australia and hosted by a third party. We will take all reasonable steps to ensure any third party data storage suppliers we partner with treat your data in a manner that reasonably protects it from misuse, loss, unauthorised access, modification or other disclosure. All supplied Personal Information is transmitted via Transport Layer Security (“TLS”) technology and then encrypted into our database only to be accessible by those authorised with access rights to such systems. All payment information, such as credit card details, are also transmitted via TLS directly to our payment provider and are never sent to, or stored on, our servers.

We process payments through a secure merchant banking facility and are compliant with PCI-DSS (Payment Card Industry Data Security Standard). In some cases where recurring payments are made, financial credit card information may be stored within our payment gateway provider in encrypted form. Credit card information will not be stored on our servers in any form. Credit card information is never stored in a cookie. If you use PayPal to complete a transaction, your personal information (including credit card information) will be collected and used by PayPal. White Shadow Foundation’s information handling processes will be regularly monitored to ensure that they are secure and that existing security measures are sufficient.

### **Retaining your Personal Information**

When your Personal Information is no longer required for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

### **Changes to our Privacy Policy**

Our Privacy Policy may be amended from time to time. An up-to-date version of our Privacy Policy can be collected from our office or viewed on our Website. It is your responsibility to review our Website regularly to keep up to date with any amendments. We may do things in addition to what is stated in this Privacy Policy to comply with the APPs, and nothing in this Privacy Policy shall deem us to have not complied with the APPs. The laws of Queensland, Australia apply to this Privacy Policy and the parties submit exclusively to the courts of that jurisdiction in relation to any alleged breach of this Privacy Policy.

### **Complaints**

You can lodge a complaint to us via email if you believe that we have breached our obligations to you under this Privacy Policy.

### **Contact Us**

If you have any queries or concerns about our Privacy Policy, or would like further information about the way we handle your Personal Information, please contact us at:

Email address: [hello@whiteshadowfoundation.org](mailto:hello@whiteshadowfoundation.org)

Website: <https://www.whiteshadowfoundation.org>

For more information about privacy in general, you can visit the Office of the Information Commissioner’s website at <http://www.oaic.gov.au>. If you wish to make a complaint about the collection, use, or disclosure of your Personal Information, a breach of the Privacy Act, the APPs, or a privacy code that applies to us, please contact our privacy officer or make a complaint via the complaint form in the contact us section of the website. If after this process you are not satisfied with our response, you can submit a complaint to the Office of the Information Commissioner. To lodge a complaint, visit the “Complaints” section of the Information Commissioner’s website.