

PRIVACY POLICY

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Approved by NTSA Council	September 2024	Review Date	September 2029

1 Introduction

- 1.1 The National Trust of South Australia fully complies with the Australian Privacy Principles (APPs) and acknowledges that they are the cornerstone of the privacy protection framework in the Privacy Act 1988 (Cth).

These principles regulate the way we collect, store, provide access to, use and the disclosure of personal information.

The Privacy Act 1988 outlines and defines individuals rights including being told generally what kind of information we are collecting and how we collect it.

- 1.2 The Australian Privacy Principles are principles-based law.

This allows National Trust SA the flexibility to tailor their personal information handling practices to our business model and the diverse needs of individuals.

They are also technology neutral, which allows us to adapt to changing technologies.

We acknowledge that a breach of an Australian Privacy Principle is an ‘interference with the privacy of an individual’ and can lead to regulatory action and penalties.

- 1.3 The National Trust of South Australia acknowledges that the Office of the Australian Information Commission (OAIC) is the independent national regulator for privacy and freedom of information and is an agency within the Attorney-General’s department.

2 Purpose

- 2.1 The purpose of this policy is to outline our commitment to the Privacy Act 1988 (Cth) and the thirteen(13) Privacy Principles around:

- The collection, use and disclosure of personal information
- An organisation or agency’s governance and accountability
- Integrity and correction of personal information

3 Policy

3.1 Open and transparent management of personal information

- 3.1.1 The National Trust of South Australia ensures that we manage personal information in an open and transparent way, including having a clearly expressed and up to date APP privacy policy.

3.2 Anonymity and pseudonymity

- 3.2.1 The National Trust of South Australia will give individuals the option of not identifying themselves, or of using a pseudonym and notes that there are limited exceptions that would apply as the adoption of this option would greatly prevent us from our usual business practices.

We would, however, work with the individual or individuals to work collaboratively towards a solution that would satisfy both parties.

3.3 Collection of solicited personal information

- 3.3.1 The National Trust of South Australia acknowledges and complies with the collection of personal information that is solicited and embeds a high standard to the collection of 'sensitive' information
- 3.3.2 We will collect and hold information that is provided by an individual for the purposes of memberships or volunteering functions and activities, and we will only collect personal information from them by lawful and fair means, without being unreasonably intrusive by way of subscriptions or registration forms.

3.4 Dealing with unsolicited personal information

- 3.4.1 The National Trust of South Australia will comply with the APPs in how we will use unsolicited personal information

3.5 Notification of the collection of personal information

- 3.5.1 The National Trust of South Australia will define and disclose when and in what circumstances we will collect personal information and how we will notify an individual of certain matters, *and*
- 3.5.2 All public documents will have a disclosure statement outlining the purpose and use of the collection of any personal information
- 3.5.3 In addition, for further information on privacy in Australia we will direct that it can be obtained by visiting the website of the Office of the Australian Information Commissioner at <http://www.oaic.gov.au/privacy/about-privacy>

3.6 Use or disclosure of personal information

- 3.6.1 The National Trust of South Australia will disclose what circumstances we may use or disclose personal information that we are holding by declaring at time of collection the conditions of use and tenure.

All information collected will be stored within approved Customer Relationship Management (CRM) and Volunteer Management System (VMS) that are ISO compliant and meet the highest standards for data storage, protection and use.

In addition, all our Financial Management Systems (FMS) comply with the requirement of both National and State legislation for the storage and protection of personal financial information.

Our Financial Management Framework meets its obligations under the ACNC Act and is aimed at maintaining aggregate fiscal discipline and allocating resources in line with Strategic Planning and using budgetary resources efficiently. Records will be kept in accordance with Australian Taxation Department policies, directives and laws.

3.7 Direct Marketing

- 3.7.1 The National Trust of South Australia acknowledges that we may only use or disclose personal information for direct marketing purposes if and when certain conditions are met.

All direct communications under the banner of 'direct marketing' using email, instant message, SMS or MMS meet the stringent requirements of The Spam Act and the ACMA.

In addition, all direct communications under the banner of 'direct marketing' by phoning meet the Do Not Call Register Act 2006.

Individuals will be given an opportunity to opt out of any form of direct marketing at any time during their association with our organisation.

3.8 Cross-border disclosure of personal information

- 3.8.1 The National Trust of South Australia acknowledges that there are steps we must take to protect personal information before it is disclosed overseas and satisfy all national and international Privacy requirements.

3.9 Adoption, use or disclosure of government related identifiers

- 3.9.1 The National Trust of South Australia acknowledges and confirms that there are limited circumstances when an organisation may adopt a government related identifier of any individual as its own identifier, or use or disclose a government related identifier of an individual

3.10 Quality of personal information

- 3.10.1 The National Trust of South Australia acknowledges that it must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete

- 3.10.2 In addition, we acknowledge that we must also take reasonable steps to ensure the personal information we use or disclose is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure

3.11 Security of personal information

3.11.1 The National Trust of South Australia will take all reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure by way of firewalls, using secure networks when transmitting electronic data, restricting access to authorised persons only and adopting a secure system of physical storage for files and records.

3.11.2 We acknowledge that we have an obligation to destroy or de-identify personal information in certain circumstances

We will destroy by shredding (physical files) or deleting (electronic data) or permanently de-identify personal information we no longer need or use.

3.12 Access to personal information

3.12.1 The National Trust of South Australia acknowledges and confirms its obligations when an individual requests to be given access to personal information held about them by the entity, *and*

3.12.2 Upon receiving a written request, National Trust of South Australia will provide the requester within 30 days from the receipt of the notice all information held by the entity in relation to the requester

3.12.3 We understand the requirement to provide access unless a specific exception applies or that where to provide access would pose a threat to health or public safety, unreasonably interfere with another person's privacy, or breach of the law. If we refuse access, we will duly advise the requester in writing of our reasons for doing so.

3.13 Correction of personal information

3.13.1 The National Trust of South Australia realises its obligation in correcting personal information it holds about individuals

3.12.2 If the requester can confirm that personal information is inaccurate, we will take reasonable steps to correct it.

If we disagree as to the accuracy of the information, they may request that we attach a statement to that information noting that they consider it is not accurate, complete or up to date.

4 Complaints Resolution

National Trust of South Australia is committed to providing members, volunteers, clients and other parties whose personal information we hold, a fair and responsible system for the handling of their complaints.

- 4.1 If at any time one of these persons listed has a complaint in relation to privacy, they are to contact us
- 4.2 We will seek to address any concerns that they have through our complaints handling processes, *and*
- 4.3 If they wish to take matters further, we are to refer their concerns to the Office of the Australian Information Commissioner.