



XAVIER
FOUNDATION

Privacy Policy

2014



A CATHOLIC
JESUIT COLLEGE
xavier.vic.edu.au

PRIVACY POLICY

1 Overview

In the course of its operations, Xavier College Foundation Limited ABN 52 005 403 476 (**Foundation**) is required to collect information from donors and others to enable the raising, administration and processing of donations to the Foundation. The Foundation also uses information collected and stored by its related body Xavier College (**School**) where consent has been received from the relevant individual to disclose that information to the Foundation.

The Foundation is bound by the Australian Privacy Principles (**Principles**) contained in the *Privacy Act 1988 (Cth)* (**Act**) with respect to how it deals with information it acquires that is personal information. Personal information may include:

...information or an 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.

The Foundation understands its responsibility to manage and use personal information in a considered and confidential manner. This Privacy Policy (**Policy**) has been developed as part of the Foundation's efforts to comply with its obligations under the Act and outlines how the Foundation will endeavour to protect the privacy of the personal information that it collects and holds in the course of carrying out its activities.

This Policy explains:

- what kinds of personal information we collect
- how we will use personal information
- when we will disclose personal information to others
- how personal information is stored and managed
- how you can access and correct your personal information, and
- how you can make a privacy complaint.

From time to time, we may review and update this Policy, for example, to reflect changes to the law, technology or our operations and practices. You should check this Policy as posted on our website periodically to read about any changes, modifications, or revisions.

It is important to note that the Principles do not apply to employee records. Accordingly, this Policy does not apply to the Foundation's treatment of employee records, where the treatment is directly related to a current or former employment relationship between the Foundation and an employee.

2 Kinds of personal information we collect

The Foundation only collects and holds personal information that is reasonably necessary for its activities. The types of personal information that we collect will depend on the nature of the interaction between you and the Foundation and the circumstances in which we collect that information. Personal information collected by the Foundation may concern:

- information from and about donors, members, supporters or people on our mailing list(s), such as their names, signatures, work and/or home addresses, phone numbers, email addresses, dates of birth, bank account details, organisations, job titles, assistants' names, partners' names, medical records and other related information;
- any other information voluntarily provided to the Foundation;
- information provided by or about students, former students, their parents and/or guardians before, during and after the course of a student's enrolment at the School;
- job applicants, staff members, volunteers and contractors; and
- details of other people who come into contact with the Foundation.

3 How we collect personal information

The Foundation will generally collect personal information directly from you; for example, when you send us correspondence or other information by email or in writing, deal with us over the telephone, in person or through our website, or otherwise contact us.

Sometimes, the Foundation may obtain or be provided with personal information about you from a third party, with or without your involvement, e.g. from the School, another donor or supporter, a report provided by a medical professional or a reference from another school. Information obtained in this way will only be used or stored if appropriate to do so and is directly related to the Foundation's activities.

4 How we use personal information you provide

The Foundation will use personal information it collects for the primary purpose for which it was obtained. The purposes for which the Foundation may use personal information include:

- to seek donations for the various funds of which the Foundation is trustee (Ignatius Education Fund, Building Fund, Library and Benevolent Funds) and generally to promote the Foundation
- to process donations and provide tax deductible receipts
- to communicate with individuals, businesses and the broader School community including by sending you information about the Foundation's activities through correspondence, annual reports, newsletters or other collateral
- to conduct its day-to-day administration
- for internal research purposes
- to communicate and co-ordinate with organisations that assist the Foundation's fundraising and community building activities or whose own activities the Foundation is supporting, and
- to allow the Foundation to discharge its legal and other obligations, for example, to record whether you have requested not to receive further communication from us.

In relation to the personal information of job applicants and contractors, the Foundation's primary purpose of collection is to assess and (if successful) to engage the applicant or contractor, as the case may be.

We may also obtain personal information about volunteers who assist the Foundation in its functions or conduct associated activities, such as alumni associations, to enable the Foundation and the volunteers to work together.

The Foundation may use personal information for secondary purposes that are related to the primary purpose and may be reasonably expected, or for which consent has been given.

If we collect your personal information for any other purpose, we will generally let you know that purpose at the time we collect the information.

5 When we might disclose personal information to others

The Foundation endeavours to confine the disclosure of personal information to the primary purpose for which it has been collected or for a secondary purpose which is permitted. For this reason, the Foundation will usually only disclose personal information, including sensitive information, held about an individual for purposes that are connected with its charitable and administrative functions or for security reasons.

Personal information obtained by the Foundation may be disclosed to third parties who assist it in conducting its activities including:

- the School
- parents and/or guardians, parent associations, Old Boy associations and other members of the broader School community
- people providing services to the Foundation, including third party service providers or contractors who distribute communications on behalf of the Foundation
- any-one you authorise the Foundation to disclose information to; and anyone to whom we are required to disclose the information to by law.

The Foundation may also store personal information in the 'cloud' which may mean that the information resides on servers which are situated outside Australia.

6 How we treat sensitive information

The Foundation will use and disclose 'sensitive information' only for the purpose for which it was provided or a directly related secondary purpose unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Sensitive information is information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; and health information and biometric information about an individual.

7 How we manage and secure personal information

The Foundation has a Privacy Officer who is responsible for the management of personal information that we collect. The Foundation's staff are required to respect the confidentiality of all personal information and the privacy of individuals, and have been directed to deal with personal information in accordance with this Policy.

The Foundation has steps in place to secure the personal information it holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and pass-worded access rights to computerised records.

If we receive personal information about you which the Foundation did not request and which it does not reasonably require, we may destroy or de-identify this information where appropriate.

If you reasonably believe that there has been an unauthorised use or disclosure of your personal information, please let us know by contacting us at the mail or email addresses or telephone number set out below:

Privacy Officer
Xavier College Foundation Limited
135 Barkers Road
Kew VIC 3101
Email: foundation@xavier.vic.edu.au
Phone: (03) 9854 5465

8 How to access personal information we hold about you

Subject to certain exceptions under the Act, an individual has the right to obtain access to any personal information which the Foundation holds about them and to advise the Foundation of any perceived inaccuracy. Access will be denied where, for example, release of the information would have an unreasonable impact on the privacy of others.

Where the personal information involves a student from the School, the student will generally have access to their personal information through their parents but older students may seek access and correction themselves. The Foundation may, at its discretion, on the request of a student grant that student access to information held by the Foundation about them, or allow a student to give or withhold consent to the use of their personal information, independently of their parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances so warranted.

To make a request to access or update any information the Foundation holds about you, please contact the Privacy Officer in writing. The Foundation may require you to verify your identity and specify what information you require. The Foundation may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the Foundation will advise the likely cost in advance.

If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for the refusal.

Note: personal employment records are exempted from the application of the Act, and hence from access.

9 How to update your personal information

The Foundation endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. Any person who believes the personal information held by the Foundation is incorrect, incomplete or out-of-date and wishes to update that information is encouraged to do so by contacting us at any time.

To update any information the Foundation holds about you, please contact us in writing. The Foundation may require you to verify your identity and specify what information you believe requires up-dating.

The Foundation is required by law not to keep some types of information for longer than necessary. If we no longer require your personal information, we will generally destroy or de-identify that information. The Foundation does, however, reserve the right to retain information for a period longer than that for which it is

required to retain the information if it considers that it is necessary, and as long as it is in accordance with the Principles.

10 Enquiries or complaints

If you have any questions about the way the Foundation manages personal information, or wish to complain about the Foundation's compliance with the Principles, please contact us.