



PRIVACY POLICY

Version	01.01		
Staff Consultation:	18 April 2024	Scheduled review	29 August 2027
Board Approval:	29 August 2024		

INTRODUCTION

Palms Australia is committed to the responsible and respectful use and protection of personal information, in compliance with [the Privacy Act 1988 \(Cth\)](#) and [the Australian Privacy Principles](#).

Under the Privacy Act 1988 (Cth) Palms Australia has obligations as to how it deals with **personal information** it collects (being information or an opinion about a reasonably identifiable person, whether true or not). The following policy provides an overview of how we are meeting these privacy compliance obligations.

Protecting privacy is important to Palms. The purpose of this policy is to convey why we may collect personal information, the purposes for which we may use that information and to whom we may disclose it.

Note: Palms Australia provides personal information to overseas entities for the purposes of recruitment and arranging travel. These overseas entities are not bound by the Privacy Act (1988) and APP and Palms Australia is not responsible for personal information held by these overseas entities.

DEFINITIONS

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable; whether the information or opinion is true or not, and whether or not the information or opinion is recorded in a material form or not (but does not include information that is de-identified.)

Privacy Act means [the Privacy Act 1988 \(Cth\)](#).

Australian Privacy Principles (APP). The thirteen (13) Australian Privacy Principles (APP) are the cornerstone of the privacy protection framework in the Privacy Act 1988 (Privacy Act). They apply to any organisation or agency the Privacy Act covers. They govern standards, rights and obligations around the collection, use and disclosure of personal information; an organisation or agency's governance and accountability; integrity and correction of personal information, and the rights of individuals to access their personal information.

The Australian Privacy Principles are principles-based law. This gives an organisation or agency flexibility to tailor their personal information handling practices to their business models and the diverse needs of individuals. They are also technology neutral, which allows them to adapt to changing technologies.

A breach of an Australian Privacy Principle is an 'interference with the privacy of an individual' and can lead to regulatory action and penalties.

Sensitive information means personal information that includes information or an opinion about an individual's:

- a. racial or ethnic origin;
- b. political opinions, membership of a political association;

- c. religious beliefs or affiliations and philosophical beliefs;
- d. membership of a professional or trade association or trade union;
- e. sexual orientation or practices;
- f. criminal record; or
- g. health information genetic or biometric information.

SCOPE/ PERSONS AFFECTED

The types of individuals about whom we collect personal information include:

- Palms Australia’s staff members, board, contractors, job applicants, consultants, program enquirers and applicants, travellers, volunteers, Palms Australia’s partners, donors, subscribers, and supporters.
- members of the public in regard to surveys or data collection; and
- other individuals or companies who have been authorised to undertake actions for Palms Australia

TYPE OF PERSONAL INFORMATION COLLECTED

We only collect the minimal amount of personal information necessary to support engagement and work with Palms Australia. This applies to our staff members, volunteers, supporters, partners, members, contractors, visitors to our website and beneficiaries of our programs. The type of information collected is dependent on the type of engagement and participation in our specific programs and activities.

This can be restricted by parties through the management of personal privacy settings which can be amended by Palms Australia personnel upon request.

The information we may collect to support engagement and work with Palms Australia includes :

- name, date of birth, gender, work and/or home addresses, email address and phone number’
- photographs or images of you, in accordance with Palms Australia’s Policies;
- compliance documentation such as Working with Children’s Checks (WWCC) and/or other required supporting documents;
- relevant travel documents for Palms Australia programs and projects;
- relevant medical information and emergency contact information.

We may also collect information about the types of social media platforms engaged with and information about each party’s relationship to Palms Australia .

For job applicants, Palms Australia may collect:

- employment history and qualifications
- academic records
- references
- personal alternative contact details
- superannuation fund details; and
- criminal history record.

COLLECTION OF INFORMATION

We may collect personal information from or about parties in different ways, including:

- from them directly when they interact with Palms Australia, e.g. from discussions with them over the phone, when they complete a form, their emails to Palms Australia and their interaction with the Palms Australia website or via a payment gateway for donations.

- through third parties with whom Palms interact to provide Palms services; and
- publicly available sources, including social media.

Palms Australia may also collect personal information about job applicants from third parties and publicly available sources, including:

- recruiters
- government departments to verify entitlement to work in Australia
- police agencies to obtain criminal history record
- academic institutions
- superannuation fund provider
- current or previous employers; or
- referees.

'Cookies' or other similar tracking technologies may also be used with website visitors that help track their website usage and remember their preferences. Cookies are small files that store information on each user computer, mobile phone, or other device. They enable the entity that put the cookie on the device to recognise them across different websites, services, devices and/or browsing sessions. Users can disable cookies through their internet browser, but the Palms website may not work as intended for the user if they do so.

Whilst Palms does not use browsing information to identify users personally, Palms may record certain information about use of its website, such as which pages are visited, the time and date of visits, search engine referrals and the internet protocol address assigned to computers.

Our web pages may contain electronic images, known as web beacons. These electronic images enable us to count users who have visited certain pages on our website. Web beacons are not used by us to access personal information, they are simply a tool Palms uses to analyse which web pages are viewed, in an aggregate number.

DIRECT MARKETING

Palms may use personal information to identify a product or service that users may be interested in or to contact them about membership opportunities, events or promotions. Palms may, with consent, use the personal information collected to contact the party from time to time whether by email, phone or other contact information have provided to tell Palms about new programs, fundraisers and opportunities that they believe may be of interest

Partners can withdraw their consent to receiving direct marketing communications from Palms at any time by unsubscribing from the mailing list by clicking to opt-out (or unsubscribe) using the links provided in the email. If they have difficulties with this, they can email to palms@palms.org.au for further assistance.

USE, COLLECTION AND DISCLOSURE

Palms may use and disclose personal information for the primary purpose for which we collected personal information, and for reasonably related secondary purposes within reasonable expectations (unless it is sensitive information, in which case the use or disclosure must be directly related to the primary purpose) and where required or authorised by law.

Some of the primary purposes for which Palms collect personal information include, but are not limited to:

- processing applications and registrations for individuals to become participants in our programs
- contacting potential participants about or processing membership applications with Palms;
- to offer or promote Palms offers, products and services offered by them or their partners (with express consent to do so);
- processing donations, sponsorships or financial support;
- recruitment and assessment of potential employees or volunteers;
- facilitating program participants' placement with an organisation for the purpose of the specific program;
- verifying identity for Palms activities;
- improving and evaluating Palms programs and services;
- complying with legal obligations, resolving any disputes and enforcing Palms agreements and rights with third parties;
- obtaining feedback about the experiences of program participants;
- covering Palms liability obligations which may require them to use personal information in incident and medical reporting;
- communicating with overseas partners to facilitate program participants' placement or participation in Palms programs;
- providing feedback or a response to queries or involvement with Palms;
- informing parties about Palms services, certain campaigns, causes, development and events;
- monitoring and documenting Palms programs and the persons engaged with/directly impacted by those program activities;
- supporting Palms review and improvement of programs and services;
- identifying potential donors or donor opportunities;
- communicating with people regarding Palms community and corporate partnerships; and
- other such purposes communicated to parties from time to time.

DISCLOSING PERSONAL INFORMATION

Palms Australia will not disclose personal information to a third party or to a platform which may reasonably be considered public without the express consent of the individual, with the exception of sensitive information disclosed for the purposes of providing emergency medical care. Consent will be sought from international program applicants, program participants, and travellers to disclose their name and relevant information to overseas third parties for the purposes of securing an international placement or for necessary travel arrangements.

Information and opinions provided to Palms Australia for the purposes of distribution through Palms Australia's website and online platforms must have the consent of all parties represented in accompanying images. By providing an article for publication, the individual agrees for the information therein to be publicly available until such a time as Palms Australia removes it from the platform(s). Requests to remove personal information from Palms Australia's public materials (online or in print) can be made to a Palms Australia representative.

Individuals will be notified of any request by a third party organisation or individual to access their personal information.

STORAGE AND SECURITY OF PERSONAL INFORMATION

Palms Australia takes privacy seriously and consciously makes all efforts to protect personal information (including any sensitive information) from interference, loss or misuse, as well as other forms of misconduct such as unauthorised access, modifications or disclosures.

Palms actively works to minimize the amount of personal information to the minimal amount required to perform its functions. Palms performs actions to reduce risk regarding any personal data that they do hold, including immediately de-identifying and segmenting of data where possible. Palms takes all reasonable steps to ensure the security of personal information and comply with requirements of an Australian Organisation under the Privacy Act 1988 and the APPs.

Sensitive information is stored independently of the Palms database and is accessible only to designated staff members. Any access of this sensitive information for purposes other than those for which it was provided is prohibited.

Individuals have the right to access personal information held and the right to request that the information held on file is correct, complete and up-to-date. Individuals may, at any time, request their personal information be updated by contacting a Palms Australia representative. Any personal information held that Palms is not required by law to retain, and/or once any information is no longer needed for any purposes and/or it has been held for the minimum applicable retention period for the relevant engagement with Palms Australia, will be immediately de-identified or deleted.

ACCESSING AND CORRECTING PERSONAL INFORMATION

Palms will take reasonable steps to make sure that the personal information they collect, use, or disclose is accurate, complete and up to date, including by correcting information that is not accurate, complete or up to date. To obtain access to personal information held by Palms, contact may be made to palms@palms.org.au.

At all times, Palms conduct under this Privacy Policy will be governed by the following principles:

- all requests for access will be treated seriously;
- Palms will need to verify identity before responding to any request;
- there is no charge for requesting access to your personal information, although Palms may require you to meet our reasonable costs in actually providing you with access; and
- all requests will be dealt with promptly and in a confidential manner (unless a disclosure is required by law).

If any party believes that information held by Palms is incorrect or they wish to elect to be removed from Palms databases, contact can be made at palms@palms.org.au or in writing at the contact details listed above outlining their request. Palms Australia will make the necessary changes unless they are required or authorised under the Privacy Act, or other relevant law to refuse access or correction. If Palms decide to refuse a request, they will inform the party in writing of the reasons and how to complain.

For individuals whose personal information is held for the purposes of their being registered as next of kin for international program participant or traveller, the international program participant or the traveller will be notified of this request for deletion and will be required to provide Palms Australia with details for a new next of kin.

The opportunity to unsubscribe from Palms Australia e-newsletter correspondence is made available in each instance of correspondence. Note that unsubscribing from this mailing list does not automatically remove an individual's record from Palms Australia's database.

INFORMATION HELD OVERSEAS

Personal information of international program applicants, participants and travellers may be provided to overseas entities for the purposes of recruitment or organising travel arrangements. By applying for an international program placement or an Encounter tour, individuals give consent for Palms Australia to share non-sensitive information with an overseas entity. Sensitive information will only be shared with the express consent of the individual.

Palms Australia is not responsible for personal information held by overseas entities.

REPORTING OF DATA BREACHES

Palms Australia is obligated to report any data breaches or suspected data breaches. Notification of a breach or suspected breach will be made to the Office of the Australian Information Commissioner and affected individuals will be notified of the breach and any necessary steps to be taken to protect their personal information.

RELATED DOCUMENTS

Complaint Management Policy

Acceptable Use of Electronic Media Policy

Fraud and Corruption Prevention Policy

Whistleblower Policy

Child Safeguarding Policy

Ethical Fundraising Policy

Transparency and Accountability Policy

REVIEW

Palms Australia will review and update this Privacy Policy every three (3) years, unless changes are required earlier, and/or following an update to our internal practices to maintain compliance with applicable law and regulation to ensure relevance and applicability. Parties may obtain a copy of the Palms current Privacy Policy from the Palms website or by contacting Palms. Parties may not be directly notified of such a change and are advised to regularly check this Privacy Policy, to be fully aware of any changes or updates.

VERSION CONTROL

Version	Purpose/ Change	Author	Date	Review	Date
01.1	Transfer of policy to new format, inclusion of updated information.	Jen Wiggins	18 April 2024	Soraya Kassim	28 April 2024