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**Mornington Peninsula Foundation Limited**

**ACN 613 870 250**

**Privacy Policy**

**1 Your rights in relation to privacy**

Mornington Peninsula Foundation Limited (**MPF**) understands the importance of protecting the privacy of an individual's personal information.

This policy sets out how MPF aims to protect the privacy of your personal information, and the way MPF collects, holds, uses and discloses your personal information.

This policy may be updated from time to time.

The MPF complies with the Australian Privacy Principles (APP's) which are part of the Privacy Act 1988.

We are committed to protecting the privacy of:

- All MPF customers, clients, supporters and donors
- All MPF employees and volunteers
- All contractors and consultants engaged by the MPF
- Representatives of the MPF
- Any PPF trainees and work experience participants

**2 What kinds of information does MPF collect?**

**2.1 De-identified information**

MPF collects de-identified and aggregate data from the client programs it funds to assist it to efficiently direct its resources. Specifically, MPF requests and collects only de-identified client information from grant recipient organisations to further its charitable constitutional purpose of providing a range of support services to families or youth in the Mornington Peninsula area. MPF does not request or collect from grant recipient organisations any personal information about clients of the programs it funds.

**2.2 Personal information**

Personal information is information or an opinion about an identified, or reasonably identifiable, individual. During the provision of its products and/or services, MPF may collect your personal information.

Generally, the kinds of personal information MPF collects are:

- (a) contact and identification information of donors such as name, address, telephone number, email address or other types of contact and identification details;
- (b) contact and identification information you provide to MPF through inquiries you make to MPF such as your name, address, telephone number, email address or other types of contact and identification details;

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- (c) where you are acting on behalf of another entity (whether as an employee, director or other representative), details of that entity and your details as a representative of that entity;
  - (d) any information relevant to the recruitment process where you are applying for a position with MPF and the information is relevant for your progress, or where you are an employee and the information is relevant to your employment with MPF; and
  - (e) any other information required for MPF's functions and activities.

In some circumstances, MPF may also hold other personal information provided by you.

MPF confirms that although relevant personal and financial information may be collected through verified and secure third parties (eg Go Fundraise, Paypal). MPF will **not** collect your financial details (eg bank account details) through these third parties. MPF will **not** collect your financial or banking details that you provide to third parties when making a donation. MPF acknowledges that our third party provider donation form requests that you provide information such as your name, email address and billing details to our third party providers. MPF encourages you to view these third parties' privacy policies.

MPF may seek your consent to publish a photograph of you to promote MPF's products and services, for example by posting a photograph on social media (eg Instagram and Facebook). MPF will obtain your consent, or the consent of your parent or guardian if you are under the age of 18, before publishing a photograph of you. MPF may obtain your consent to publish a photograph either directly from you or through another organisation (eg through your school).

### **3 How does MPF collect personal information?**

Generally, MPF collects your personal information directly from you, through the completion of a manual or online form, an interaction or exchange in person or by way of telephone, facsimile, email, post or through the use of the MPF website.

Generally, MPF will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you.

Although MPF may collect donors' personal information from verified and secure third party providers, MPF will **not** collect bank details and other financial information from third party providers.

### **4 Why does MPF need your personal information?**

MPF collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of:

- (a) providing MPF's services and products to you (or the organisation you represent) and all associated purposes;
- (b) notifying you of, and promoting, its products and services to you including upcoming events;
- (c) assisting MPF to improve its products and services;

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- (d) promoting its products and services to the public (eg by posting a photograph of you on social media, which would only be done with your consent or the consent of your parent or guardian if you are under 18 years of age);
  - (e) maintaining donor records;
  - (f) identifying and informing you of other products and services that may be of interest to you from MPF or selected third parties;
  - (g) processing and assessing employment applications for current and future positions;
  - (h) your employment with MPF;
  - (i) accounting, billing, mail outs and other internal administrative purposes;
  - (j) otherwise managing MPF's internal business operations and processes; and
  - (k) any other legal requirements.

MPF may also use your personal information for purposes related to the above purposes and for which you would reasonably expect MPF to do so in the circumstances, or where you have consented, or the use is otherwise in accordance with law.

Where personal information is used or disclosed, MPF takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to MPF. However, without certain information from you, MPF may not be able to provide its products and/or services to you.

## **5 To whom does MPF disclose your personal information?**

MPF discloses your personal information for the purpose for which MPF collects it. That is, generally, MPF will only disclose your personal information for a purpose set out at paragraph 4. This may include disclosing your personal information to:

- (a) third parties engaged to perform administrative or other business management functions;
- (b) MPF's professional advisors, agents, contractors, consultants and related bodies corporate;
- (c) insurance providers;
- (d) recruitment and labour hire agencies (as required); and
- (e) regulatory bodies if and as necessary, including during audit processes.

MPF's disclosures of your personal information to third parties are on a confidential basis and/or otherwise in accordance with law. MPF may also disclose your personal information with your consent or if disclosure is required or authorised by law.

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MPF will only publish personal information about a donor on its website with the consent of the relevant donor. MPF treats all donor information as private and confidential, and only discloses donor information with the consent of the relevant donor.

If a donor requests information about how their donated money is spent, MPF may provide de-identified information to the donor. Information regarding how a donor's money is spent is private and confidential, and MPF will only disclose that information with the donor's consent.

## **6 Overseas disclosures**

MPF is not likely to disclose any personal information to overseas recipients.

However, if MPF becomes likely to disclose personal information to any recipients located overseas, MPF will update this privacy policy regarding the likely disclosures (including, if it is practicable to do so, the countries in which such overseas recipients are likely to be located).

## **7 Direct marketing**

MPF may collect, hold, use and disclose personal information in order to inform interested persons or entities of products and services offered by MPF or to facilitate business relationships.

Individuals can opt-out of receiving such communications by contacting MPF on the contact details set out in paragraph 11 or through any opt-out mechanism contained in a marketing communication.

## **8 Security of your personal information**

MPF takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference, and loss and from unauthorised access, modification, or disclosure.

MPF holds personal information, including personal information about donors, in electronic forms in secure databases on secure premises, accessible only with the appropriate passwords by authorised staff.

MPF will destroy or de-identify personal information in circumstances where it is no longer required, unless MPF is otherwise required or authorised by law to retain the information.

## **9 Can you access and correct the personal information that MPF holds about you?**

MPF takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading. If at any time you would like to access or correct the personal information MPF holds about you, or you would like more information on MPF's approach to privacy, please contact MPF on the details set out in paragraph 11 below.

MPF will grant access to a reasonable extent and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

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To obtain access to your personal information:

- (a) you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- (b) MPF requests that you be reasonably specific about the information you require; and
- (c) MPF may charge you a reasonable administration fee, which reflects the cost to MPF for providing access in accordance with your request.

MPF will endeavour to respond to your request to access or correct your personal information within 30 days from your request.

## **10 Cookies**

When you are accessing MPF's website, MPF uses 'cookies' which are small pieces of information sent from the website and stored by your browser on your computer's hard drive. Cookies that MPF uses enable its systems to provide features of its services, personalise and improve your experience, and improve the functionality and user-friendliness of its services and monitor how its website is used through your computer.

This information is used by MPF to improve and tailor its website functionality and better understand how you interact with MPF's products and services and to monitor aggregate usage and web traffic routing on its website. You can modify your browser setting by editing your browser options to reject MPF's cookies or to prompt you before accepting a cookie. However, if a browser does not accept cookies or if you reject a cookie, some portions of MPF's online services may not function properly.

## **11 How to contact us**

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications, please contact MPF at: [privacyofficer@mpf.org.au](mailto:privacyofficer@mpf.org.au)

## **12 Resolution of privacy concerns**

For information about privacy generally, or if your concerns are not resolved to your satisfaction, you may contact the Office of the Australian Information Commissioner at <https://www.oaic.gov.au/> or phone 1300 363 992.