

# PRIVACY POLICY

## INTRODUCTION

The Board of BridgIT Water Foundation is committed to protecting the privacy of personal information which it collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

## PURPOSE

The purpose of this document is to provide a framework for BridgIT Water Foundation in dealing with privacy considerations.

## POLICY

BridgIT Water Foundation collects and administers a range of personal information for the purposes of communications, marketing, understanding and serving its supporter base. The organisation is committed to protecting the privacy of personal information it collects, holds and administers.

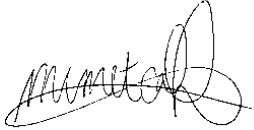
BridgIT Water Foundation recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the Privacy Act 1988 (Cth) and the General Data Protection Regulation (GDPR).

BridgIT Water Foundation is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

BridgIT Water Foundation will:

- Obtain “informed consent” from individuals who provide personal information.
- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why BridgIT collects the information and how it administers the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person’s consent;
- Store personal information securely, protecting it from unauthorised access;
- Inform and obtain consent (in some cases this consent will be implied) from stakeholders that information may be shared with BridgIT Water Foundation partners and service providers overseas, and that those partners and service providers are as compliant with privacy as BridgIT Water Foundation.
- Provide stakeholders with access to their own information, and the right to seek its correction; and
- Provide stakeholders with the “right to be forgotten.”

## **AUTHORISATION**



Signature of Board Secretary

11<sup>th</sup> June 2018

Date of approval by the Board  
BridgIT Water Foundation

## **PRIVACY PROCEDURES**

### **RESPONSIBILITIES**

BridgIT Water Foundation's Board is responsible for developing, adopting and reviewing this policy.

BridgIT Water Foundation's Founding Director is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

### **PROCESSES**

#### **Collection**

BridgIT Water Foundation will:

- Only collect information that is necessary for the performance and primary function of BridgIT Water Foundation, which is to provide suitable, accessible, and sustainable water solutions to the poorest and most marginalised people in rural, peri-urban areas, and small remote villages in developing nations.
- Notify stakeholders about why it collects the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect Sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others.)
- Determine, where unsolicited information is received, whether the personal information could have been collected it in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information.)

#### **Use and Disclosure**

BridgIT Water Foundation will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.

- For other uses, BridgIT Water Foundation will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
  - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
  - the person has consented; or
  - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and BridgIT Water Foundation has provided an opt out and the opt out has not been taken up.
- In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- State in BridgIT Water Foundation's privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as BridgIT Water Foundation is required to be.
- Provide all individuals access to personal information except where it is a threat to life or health or it is authorised by law to refuse and, if a person is able to establish that the personal information is not accurate, then BridgIT Water Foundation must take steps to correct it. BridgIT Water Foundation may allow a person to attach a statement to their information if BridgIT Water Foundation disagrees it is inaccurate.
- Where for a legal or other reason BridgIT Water Foundation is not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

## **Storage**

BridgIT Water Foundation will:

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.
- Before BridgIT Water Foundation discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. BridgIT Water Foundation will have systems which provide sufficient security.
- Ensure that BridgIT Water Foundation's data is up to date, accurate and complete.

## **Destruction and de-identification**

BridgIT Water Foundation will:

- Destroy personal information once it is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information BridgIT Water Foundation holds and will not use any government related identifiers unless they are reasonably necessary for our functions.

## **Data Quality**

BridgIT Water Foundation will:

- Take reasonable steps to ensure the information BridgIT Water Foundation collects is accurate, complete, up to date, and relevant to the functions it performs.

## **Data Security and Retention**

BridgIT Water Foundation will:

- Only destroy records in accordance with the organisation's Records Management Policy.

## **Openness**

BridgIT Water Foundation will:

- Ensure stakeholders are aware of BridgIT Water Foundation's Privacy Policy and its purposes.

- Make this information freely available in relevant publications and on the organisation's website.

### **Access and Correction**

BridgIT Water Foundation will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

### **Anonymity**

BridgIT Water Foundation will:

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

### **Making information available to other organisations**

BridgIT Water Foundation will:

- Release information to third parties where it is requested by the person concerned.

## **AUTHORISATION**

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Signature of Founding Director

A handwritten signature in cursive script, appearing to read 'Wendy Tisdell', written in black ink on a white background. The signature is positioned above a horizontal line.

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Wendy Tisdell

18 / 5 / 2018

Date

# PRIVACY POLICY – FOR EXTERNAL USE/PRIVACY ACT COMPLIANCE

## PRIVACY POLICY

Your privacy is important.

This statement outlines *BridgIT Water Foundation's* policy on how *BridgIT Water Foundation* uses and manages personal information provided to or collected by it.

*BridgIT Water Foundation* is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012. In relation to health records, *BridgIT Water Foundation* is also bound by the Victorian Health Privacy Principles which are contained in the Health Records Act 2001. *BridgIT Water Foundation* complies with the General Data Protection Regulation (GDPR).

*BridgIT Water Foundation* may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to *BridgIT Water Foundation's* operations and practices and to make sure it remains appropriate to the changing legal environment.

What kind of personal information does *BridgIT Water Foundation* collect and how does *BridgIT Water Foundation* collect it?

The type of information *BridgIT Water Foundation* collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Name
- Place of residence
- Telephone number
- E-mail address
- Financial information
- Health conditions
- Socio-economic situation
- Hardships

## PERSONAL INFORMATION YOU PROVIDE:

*BridgIT Water Foundation* will generally collect personal information held about an individual by way of emails, forms, documents etc. You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

Personal Information provided by other people:

In some circumstances *BridgIT Water Foundation* may be provided with personal information about an individual from a third party, for example country partners may collect data to ascertain whether a water well should be provided.

In relation to employee records:

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to *BridgIT Water Foundation's* treatment of an employee record, where the treatment is directly related to a current or former employment relationship between *BridgIT Water Foundation* and employee. However, *BridgIT Water Foundation* must provide access and ensure compliance with the Health Privacy Principles under the Victorian Health Records Act 2001.

How will *BridgIT Water Foundation* use the personal information you provide?

*BridgIT Water Foundation* will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, *BridgIT Water Foundation* will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If it uses your personal information obtained from elsewhere it will still send you direct marketing information where you have consented and which will also contain an opt out. *BridgIT* will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

## **JOB APPLICANTS, STAFF MEMBERS AND CONTRACTORS:**

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

The purposes for which *BridgIT Water Foundation* uses personal information of job applicants, staff members and contractors include:

- for insurance purposes;
- to satisfy *BridgIT Water Foundation's* legal obligations,
- Where *BridgIT Water Foundation* receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

## **VOLUNTEERS:**

*BridgIT Water Foundation* also obtains personal information about volunteers who assist *BridgIT Water Foundation* in its functions or conduct associated activities, such as to enable *BridgIT Water Foundation* and the volunteers to work together.

## **MARKETING AND FUNDRAISING:**

*BridgIT Water Foundation* treats marketing and seeking donations for the future growth and development of *BridgIT Water Foundation* as important. Personal information held by *BridgIT Water Foundation* may be disclosed to an organisation that assists in *BridgIT Water Foundation's* fundraising, for example, when applying for grants, *BridgIT Water Foundation* may reveal project recipients as well as anticipated individual funders.

Who might *BridgIT Water Foundation* disclose personal information to?

*BridgIT Water Foundation* may disclose personal information, including sensitive information, held about an individual to:



- government departments;
- people providing services to *BridgIT Water Foundation*
- grant providers, international and domestic
- country partners
- anyone you authorise *BridgIT Water Foundation* to disclose information to.

## **SENDING INFORMATION OVERSEAS:**

*BridgIT Water Foundation* will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

BridgIT uses overseas providers of IT services including servers and cloud services.

How does *BridgIT Water Foundation* treat sensitive information?

In referring to 'sensitive information', *BridgIT Water Foundation* means:

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

Sensitive information will be used and disclosed 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.

Individual Right: Management and Security of Personal Information

*BridgIT Water Foundation's* staff are required to respect the confidentiality of personal information and the privacy of individuals.

*BridgIT Water Foundation* has in place steps to protect the personal information *BridgIT Water Foundation* holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. We may also collect information about your IP address, although this may not identify you.

Updating personal information

*BridgIT Water Foundation* endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by *BridgIT Water Foundation* by contacting the Privacy Officer of *BridgIT Water Foundation* at any time.

The Australian Privacy Principles and the Health Privacy Principles require *BridgIT Water Foundation* not to store personal information longer than necessary. In particular, the Health

Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what personal information *BridgIT Water Foundation* holds about you.

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which *BridgIT Water Foundation* holds about them and to advise *BridgIT Water Foundation* of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information *BridgIT Water Foundation* holds about you, please contact the Privacy Officer in writing.

**Data access:** Under GDPR, individual data subjects have the right to confirm with a Data Controller or Privacy Officer whether the organisation is processing their personal data. If it is, the Data Controller/Privacy Officer can provide the data subject with information about such processing, including the specific data processed, the purposes of the processing, and the other parties with whom such data has been shared.

**Right to Object:** Data subjects can in certain cases object at any time to the processing of their personal data, in particular if the processing is for direct marketing purposes.

**Data Rectification:** Data subjects can request that a controller correct or complete personal data if the data is inaccurate or incomplete.

**Restriction of Processing:** Data subjects can request that a controller stop access to and modification of their personal data. For example, the controller can mark or use technological means to ensure that such data will not be further processed by any party.

**Data Portability:** In certain cases, data subjects have the right to ask a controller to provide their personal data in a structured, commonly used, and machine-readable format (for example, a .csv file) so that they can transmit their own personal data to another company.

**Right to Erasure:** Also known as “the right to be forgotten,” this right empowers data subjects to request that a data controller delete or remove their personal data in situations such as the following: when the data is no longer needed for the original purpose, when the data subject withdraws consent, or when the data subject objects to the processing and the controller has no overriding legitimate interest in the processing.

*BridgIT Water Foundation* may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, *BridgIT Water Foundation* may charge a fee to retrieve and copy any material. If the information sought is extensive, *BridgIT Water Foundation* will advise the likely cost in advance.

How long will *BridgIT Water Foundation* keep my information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

## **ENQUIRIES AND PRIVACY COMPLAINTS**

If you would like further information about the way *BridgIT Water Foundation* manages the personal information it holds, please contact the Privacy Officer. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Privacy Officer who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns we will meet with you to discuss further. If you are not

satisfied with our response to your complaint within 30 days from this meeting then you can refer your complaint to the Office of the Australian Information Commissioner via:

**email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**tel:** 1300 363 992

**fax:** +61 2 9284 9666