



Baplink

A Ministry of The Baptist Union of Queensland

Privacy Policy

Document Control Information

This is a document controlled by the Baptist Management Council (BMC).

Review Date

This Policy will be reviewed in July 2024 and every three years thereafter, or as changes are made to the *Privacy Act 1988*. All amendments to this policy must be approved by the BMC.

1. Introduction and Definitions

1.1 Scope

This Policy applies to Baplink, a Ministry of The Baptist Union of Queensland (ABN 59 241 212 544) and has been approved by the Baplink Management Council (BMC). Baplink and BMC are bound by the requirements of the *Privacy Act 1998 (Commonwealth)* (Privacy Act).

1.2 Policy Outline

This Policy is available on request and published on our website at <https://www.baplink.org.au/privacy-policy>. Baplink is committed to ensuring the confidentiality and security of the personal information supplied to us by individuals and has established practices, procedures, and systems to ensure compliance with the Australian Privacy Principles as defined in the Privacy Act.

This Policy outlines Baplink's practices, procedures, and systems with respect to the following:

- What personal information we collect and hold;
- How we collect and hold information;
- How we handle information via electronic communication;
- Why we collect, hold, use, and disclose your information;
- How you can access and correct your information; and/or
- How you can complain about the handling of your personal information.

1.3 Definitions

Confidentiality applies to the relationship of confidence. Confidentiality ensures that information is accessible only to those authorised to have access and is protected throughout its lifecycle. Confidential information may be marked as such or deemed confidential by its nature such as information that is not available in the public domain.

Consent means voluntary agreement to some act, practice, or purpose. Consent has two elements: knowledge of the matter agreed to and voluntary agreement.

Individual means any person such as a client, staff member, Board member, volunteer, student, contractor, or a member of the public.

Organisational information includes both publicly available and some confidential information about organisations. Organisational information is not covered in the Privacy Act but some organisational information may be deemed confidential.

Personal information means information or an opinion (including information or an opinion forming part of a database) about an individual.

Privacy provisions of the Privacy Act govern the collection, protection and disclosure of personal information provided to Baplink by clients, Board members, staff, volunteers, students, and stakeholders.

The public domain in relation to confidentiality is “common knowledge,” i.e., information that can be accessed by the public.

2. What personal information do we collect and hold?

We only ask for personal information relevant to our business relationship with a client or prospective client. When you apply for one of our products or services, we may request:

- identifying information, such as your name, address and other contact details, and your date of birth;
- KYC (know your customer) information and documentation specified under the *Anti-Money Laundering & Counter-Terrorism Financing Act 2006 (Commonwealth)* (AML/CTF Act);
- your current financial circumstances;
- your bank account details;
- your current and historical employment information;
- your church and/or ministry;
- your tax file number;
- your reasons for applying for a product or service; and/or
- any other information that is relevant to the product or service that we provide.

3. How do we collect and hold personal information?

3.1 Collecting information

Wherever possible, we will collect personal information directly from you. This information will generally come from what you provide in your application for one of our products or services and from the required supporting documentation.

In some circumstances we may be provided with personal information about an individual from somebody else, for example: a referral from another person, or if we are given information by your employer if you or they use our products or services, or from information that is publicly available on websites, or from third party experts where they have obtained your consent to provide your personal information to other parties. The prior examples are not exhaustive.

3.2 Holding information

We hold your information in our online systems and in our on-site filing system. We take all reasonable steps to ensure that your personal information is protected from:

- misuse, interference, and loss; and
- unauthorised access, disclosure, and modification.

When we no longer require personal information (including when we are no longer required to keep records relating to you), we will take all reasonable steps to ensure that information is destroyed or de-identified.

4. How do we handle information via electronic communication?

4.1 Visiting our Website

Anytime you access an unsecured part of our website, (that is, a public page that does not require you to log on), we will collect information about your visit, such as:

- The time and date of visit;
- Any information or documentation that you download;
- Your browser type; and
- Internet protocol details of the device used to access the site.

4.2 Cookies

A "cookie" is a small text file which is placed on your internet browser and which we may access each time you visit our website. When you visit the secured pages of our website (i.e., pages that you must provide login details to access) we use cookies for security and personalisation purposes.

When you visit the unsecured pages of our website (i.e., public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies; however, doing so might prevent you from accessing the secured pages of our website.

4.3 Email

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so.

Your email address will only be used or disclosed for the purpose for which it was provided. It will not be added to any mailing list or used for any other purpose without your consent.

4.4 Security

We use up-to-date security measures on our website to protect your personal information. Any data containing personal, credit, or related information which we transmit via the internet is encrypted.

4.5 Notifiable Data Breach (NDB) Procedures

The NDB scheme in Part IIIC of the Privacy Act requires Baplink to notify affected individuals and the Commonwealth Privacy Commissioner of certain data breaches that meet the following criteria:

- There is unauthorised access to, or disclosure of, personal information held by Baplink (or information is lost in circumstances where unauthorised access or disclosure is likely to occur).
- This is likely to result in serious harm to any of the individuals to whom the information relates.
- The entity has been unable to prevent the likely risk of serious harm with remedial action.

In the event of an NDB, Baplink will immediately notify all affected individuals and notify the Commonwealth Privacy Commissioner. BMC will also be notified and a member of senior management and/or the board will be appointed to oversee the investigation and rectification of the NDB.

5. Why do we collect, hold, use, and disclose your information?

5.1 Why do we collect and hold your information?

We are required by the AML/CTF Act to collect, verify, and hold information about your identity and the underlying transaction before we are able to extend financial services to you, and in order to allow us to continue extending those services to you. The AML/CTF Act also requires that we continue to hold this information about you for seven years after we cease to extend our products and services to you.

5.2 How do we use your information?

We may use information you provide to us to:

- execute your instructions;
- determine charges and billing;
- assess your suitability for our products and services;
- direct market suitable products and services to you;
- maintain and develop our business systems and management processes; and/or
- comply with legal and regulatory requirements.

We will not use government-issued identifiers as our own identifier for you unless a specific exemption is granted under the Privacy Act or related legislation. For example, we may collect the following pieces of information, but we will not use this as the basis of recording your information on our system: Centrelink number, driver's licence number, Medicare number, or passport number.

5.3 To whom do we disclose your information?

As part of the requirements under the AML/CTF Act and consistent with normal business practices, we may be required to disclose your information to one or more of the following:

- entities that verify identity and perform KYC due diligence under the AML/CTF Act;
- lawyers, conveyancers, accountants, brokers, and agents representing you;
- contractors for statement printing and mail out, card and cheque production, market research, or direct marketing; and/or
- law enforcement and government agencies as required by law or in compliance with their lawful orders relating to their enforcement activities.

6. How can you access and correct your information?

6.1 Access to your information

If you wish to confirm what information is held by Baplink, please contact us by telephone, email, or in writing as per the contact details below.

6.2 Correction of your information

If you wish to correct the information held by Baplink, please contact us by telephone, email, or in writing as per the contact details below.

7. How can you complain about the handling of your personal information?

If you have any questions, concerns, or complaints about this Policy, or the handling of your personal information, please contact Baplink as follows:

The Privacy Officer
Baplink
37 Redgum Place PO Box 6166
Gaythorne Qld 4051 Mitchelton Qld 4053
T: 1800 650 062
F: 07 3354 5605
E: privacy.officer@baplink.org.au

Once a complaint has been lodged, Baplink will respond to you as soon as possible. We will aim to deal with your complaint at the time of your complaint. If you are not satisfied with the response you receive, please let us know and we will investigate further and respond to you.

If you still are not satisfied, you can contact external bodies that deal with privacy complaints. These are the Australian Financial Complaints Authority (see below) which is our external dispute resolution scheme and the Federal Privacy Commissioner (see below).

Australian Financial Complaints Authority

GPO Box 3, Melbourne Vic 3001
Telephone: 1300 56 55 62
Website: www.afca.org.au

Federal Privacy Commissioner

Post: GPO Box 5218 Sydney NSW 2001
Telephone: 1300 363 992
Website: www.oaic.gov.au

8. Changes to this Privacy Policy

We may make changes to this Privacy Policy from time to time (without notice to you) that are necessary for business requirements or the law. Our website will always make the current Privacy Policy available.

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