



## **PRIVACY POLICY**

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## 1 INTRODUCTION

Crossway Baptist Church Inc. (Registration Number: A0045459U), respects your personal information and upholds your rights to privacy protection in accordance with this Privacy Policy and the Australian Privacy Principles contained in the *Privacy Act 1988*.

This Policy covers how Crossway Baptist Church Inc. (in its personal capacity or as trustee of any trust) and its related entities, Crossway LifeCare Ltd (ABN: 61 144 934 592) and The Trustee For Crossway Kingdom Fund (ABN: 90 518 196 773) (hereinafter to be collectively referred to as “Crossway”) handle your personal information. To make it easy for you to deal with Crossway provide you with a more personal and consistent experience, Crossway may exchange and combine personal information between the related entities of Crossway.

By visiting our website or using any of our services, you agree that your personal information will be handled as described in this Policy.

## 2 WHAT IS PERSONAL INFORMATION?

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is either identified or reasonably identifiable. Examples include an individual's name, address, contact number and email address.

## 3 WHOSE PERSONAL INFORMATION DOES CROSSWAY COLLECT?

Crossway collects personal information from people who are connected to Crossway and/or its services including employees, employment candidates, attendees, members, donors, volunteers, visitors, missionaries, events/activities participants or invitees, subscribers to our mailing lists or newsletters, other persons who request our services, contractors, licensors, licensees, partners and suppliers etc.

## 4 WHAT KIND OF PERSONAL INFORMATION DOES CROSSWAY HOLD?

### 4.1 Personal Information

The type of personal information we collect depends on the reason for collecting it.

Personal Information may include your name, identification numbers and contact details – including postal address, email address and telephone numbers, or other relevant information about you.

- a) If you are part of a household, information relating to your household may be collected – such as personal information of your family members and identity of person(s) who have authority to collect/pick up your children from activities run by Crossway
- b) If you are a member of Crossway, information including name, address, the date of becoming a member of Crossway must be collected and entered into the Register of Members
- c) If you choose to make Crossway your home church, information / records of your involvement / progress in partnership with Crossway’s mission and services may be collected. Such information includes your background, communications, role(s) and involvement in the Crossway’s activities / services. Other information that may be collected includes checks / records that are pre-requisite for your role(s) at Crossway – comprising working with children check, CrimCheck, first aid certificate, food processing certificate, etc.
- d) If you tithe / donate / make payments / sponsorships, information relating to your tithing / donation / payments / sponsorships / transaction may be collected, including its history, bank account and debit/credit card information. In part, such information is required for Crossway to issue tax deductible receipts.

#### **4.2 Video and Security Recording**

- a) Crossway may from time to time record video or images of services and activities at Crossway. These videos and images of the people attending or participating in these services and activities may be recorded, used and shown for information, ministry, teaching, fundraising and/or promotional purposes. By attending these services and activities, you agree and give your consent to Crossway with regard to the video and images recording and using your images in these recordings for such purposes.
- b) In addition, Crossway operates video surveillance and recording for security purposes on its premises. Signage of this practice is posted on external entrances to the premises and internal areas within the premises. Crossway may use and disclose the video footage from these cameras for legal and security reasons.

#### **4.3 Collection of Sensitive Information**

Sensitive information concerning your health, religious belief, criminal history, education background, academic/professional qualification/working experience, financial conditions, court determinations and any other specific information relevant to the services or assistance you have requested from Crossway may also be collected.

By requesting Crossway’s services and assistance, you understand that such sensitive information may be gathered about you and you consent to its collection.

## **5 HOW DO WE COLLECT AND HOLD YOUR PERSONAL INFORMATION?**

### **5.1 Collecting information directly from you**

Where possible, we collect your personal information directly from you. This may be done in person (for example, by requesting you to fill out a form), on the telephone (for example, if you contact Crossway), or online (for example, if you sign up for an event/activity online). Crossway

often uses electronic means, such as website, email or SMS, as a convenient way to communicate with you to verify your details.

## **5.2 Collecting information via website browsing and cookie**

We collect and hold information via our website when you fill out a form (e.g. when registering for an event). The information that we request is limited to what is needed to provide you with the service. When you access our website, we may use software embedded in our website (such as JavaScript) and we may place small data files (or cookies) on your computer or other device to collect information about which pages you view and how you reach them, what you do when you visit a page, the length of time you remain on the page, and how we perform in providing content to you.

A cookie does not identify individuals personally, but it does identify computers and other devices. You may set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

We may gather your internet Protocol (IP) address and the following information for statistical purposes:

- a) Your service IP address
- b) your top level domain name (e.g. .com, .gov, .au, .uk etc.)
- c) the date and time of your visit to the site
- d) the pages you accessed and documents downloaded
- e) the previous site that you visited and/or the search engine keyword used to find our site
- f) the type of browser and operating system you are using
- g) the amount of data in bytes that you download from our site

for online donation/giving, your login ID, password and complete history of your contributions.

## **5.3 Collecting information from Third Parties**

We also obtain personal information from third parties such as your children, parents or guardians, authorised persons, regulatory authorities (such as Department of Justice), service providers (such as fundraising service providers), health services professionals, social and community workers. Where you provide us with personal information about someone else you must have their consent to provide their personal information to us based on this Policy and have read and understood this Policy and consent to us collecting, using and disclosing the information that you provide as described in this Policy.

## **5.4 Collecting Information from Social Networking Services**

We use social networking services such as Twitter, Facebook, Apps and YouTube to communicate with the public about our services. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These sites may have their own privacy policies.

## **5.5 Consequence of not providing your Personal Information**

If you don't provide some or all of the personal information to us, we may not be able to:

- a) interact with an individual or provide ministry opportunities in a meaningful way; and / or
- b) provide you with access to some or all of our services or the assistance you have requested.

## **5.6 Anonymity or using a pseudonym**

You are not obliged to give us your personal information. If you have a general enquiry, you can choose to do this anonymously or use a pseudonym. However, if you choose not to provide Crossway with your personal information, such as your name or address, the range of options and services to adequately address your circumstances may be limited.

## **5.7 Purpose for personal information collection**

We collect your personal information in connection with carrying out our activities, such as:

- a) Support services: to administer your relationship with Crossway, meet your ministry needs, ensure security of children's participation in ministries and facilitate delivery of other services.
- b) Event promotions: to let you know about Crossway's worship services, events, ministry material, fundraising activities, any other programs and information.
- c) Compliance with laws/regulations: we may collect information about you because we are required or authorised by law to collect it. There are laws / regulations that affect Crossway, including Baptist Union Incorporation Act 1930 (Vic), Associations Incorporation Reform Act 2012 (Vic), Corporation Act 2001 (Cth), Australian taxation laws and other relevant laws and regulations from or related to Australian Charities and Not-for-profits Commission / Australian Taxation Office / Consumer Affairs Victoria which require us to collect personal information.

## **5.8 Opt Out**

Whenever you are sent promotional and fundraising information by post, email or telephone, you will also be provided with an opportunity to opt-out from receiving such material.

## **5.9 How do we hold/store your personal information?**

We take reasonable steps to protect all of the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. Your personal information may be stored on a password protected electronic database, which may be on our database, a database maintained by a cloud hosted service provider or other third party database storage or server provider. However, as data transmission via electronic means (such as the internet) cannot be guaranteed to be totally secure, we do not accept responsibility for the security of information transmitted to or by us via electronic means. In addition, we are unable to ensure that third parties to whom we disclose your personal information will keep your information secure or otherwise observe the Australian Privacy Principles.

Backups of electronic information are written to drives or other media which may be stored both onsite or offsite or both.

Hard copy information is generally stored in our office, which are secured to prevent entry by unauthorised people.

Your personal information will stay on the database or in our records indefinitely until you advise you would like it removed (but subject to our legal obligations to retain it or our need to retain it in order to comply with our legal obligations or exercise our legal rights), unless we de-identify it or destroy it earlier in accordance with privacy law requirements or deemed no longer to be required.

## **6 HOW DO WE USE YOUR PERSONAL INFORMATION?**

We use your personal information in the following ways:

- for the purposes for which the information is provided to or collected by us;
- or purposes to which you have consented, expressly or impliedly;
- for purposes in connection with legal proceedings;
- for the purposes of direct marketing (such as through mail, telephone, email or other electronic means), including to provide you with information about our services;
- to provide regular email communications or newsletters (both electronic and hardcopy) or news or current issues;
- to have a record of the particulars of our employees and volunteers;
- to assist Crossway in its operations and planning; and
- for purposes otherwise permitted by law.

You may contact us if you do not want to receive any marketing information from us. We will then cease sending such information to you as soon as practicable. We will not provide your personal information to non-associated parties for the purposes of their direct marketing of their goods or services to you, unless you agree for us to do so.

## **7 WHAT HAPPENS WHEN WE NO LONGER NEED YOUR PERSONAL INFORMATION?**

We will only keep your information for as long as we require it for our purposes. We are also required to keep some of your information for certain periods of time under law, such as the Associations Incorporation Reform Act 2012 (Vic), Corporations Act 2001 (Cth) and taxation laws. When we no longer require your information, we will ensure that your information is destroyed or de-identified.

## **8 WHO DOES CROSSWAY SHARE/DISCLOSE YOUR PERSONAL INFORMATION WITH?**

Crossway will not sell your personal information to third parties. In order to facilitate provision of ministry services and meet your needs, your personal information may be shared on a confidential basis:

- a) between the related entities of Crossway which have a need to know to provide a specific service to you including issuance of tax deductible receipts; or

- b) with third party service providers engaged by Crossway which function is to maintain Crossway's 'database system or to facilitate mass communication of material prepared by Crossway or to effect electronic funds transfer which you have authorised; or
- c) other third party service providers and contractors who provide services to us, including persons who are not in Australia; or
- d) credit reporting agencies; or
- e) with our advisors if in our opinion, the circumstances warrant us to seek professional counsel / advice to best address any concerns / issues; or
- f) with superannuation and managed funds organisations and salary packaging services provider – in the case of employees of Crossway; or
- g) with Government or regulatory bodies / agencies (may include Consumer Affairs Victoria, Australian Charities and Not-for-profits Commission (ACNC), Australian Securities & Investments Commission (ASIC), the Australian Taxation Office and Baptist Union of Victoria) as required or authorised by law or regulations; or
- h) with parties that Crossway is required or permitted by law to disclose; or
- i) with any other parties that you have given your prior consent (expressly or impliedly) for disclosure; or
- j) with Government agencies to protect the welfare of children or vulnerable adults in accordance with the relevant law; or
- k) with Government agencies to prevent or report a criminal act.

We may also disclose your personal information where

- disclosure is required or desirable to lessen or prevent a serious threat or harm to an individual's or public life, health or safety;
  - there are serious concerns about the safety or wellbeing of any person;
  - the information is subpoenaed, is required to be disclosed by law or a court or tribunal, or is disclosed in relation to legal proceedings;
  - the information is required by a law enforcement agency or a competent authority;
- or
- disclosure is required by mandatory regulatory requirements or professional codes by which we or our staff are bounded

## 9 SHARING OF INFORMATION OUTSIDE OF AUSTRALIA?

If any personal information collected by Crossway is stored or managed by a third party on behalf of Crossway, the third party may store certain personal information outside Australia.

We may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held.

You consent to the disclosure and transfer of your information to third party service providers and contractors who are not in Australia and therefore subclause 8.1 of the Australian Privacy Principles does not apply

## 10 ACCESSING YOUR PERSONAL INFORMATION

We will, upon your request, and subject to applicable laws, provide you with access to your personal information that is held by us. You can request access to personal information that we hold about you by writing to Crossway (see “How to Contact Us” below).

In some circumstances, your request may be denied on any of the following basis:

- a) access would pose a serious threat to the life or safety of any individual or to public safety; or
- b) access would have an unreasonable impact on other individuals; or
- c) the request is frivolous; or
- d) as required or authorised by law or a court or tribunal order; or
- e) access would be unlawful; or
- f) access may prejudice commercial negotiations, legal proceedings, enforcement activities or appropriate action being taken in respect of a suspected unlawful activity or serious misconduct.

If we refuse to grant you access to your personal information, we will provide you with reasons for that decision (unless it is unreasonable to do so). We will also advise you of the avenues available for you to complain about the refusal.

We may charge a reasonable fee for access to your personal information. For security reasons, a written request will be required to access or correct your personal information.

## 11 QUALITY OF PERSONAL INFORMATION

We take reasonable steps to ensure that the personal information we collect is accurate, up-to-date and complete, including that we:

- a) record information in a consistent format;
- b) confirm the accuracy of information, where necessary. From time to time, Crossway may conduct a census to update its database. Crossway will record and collect all the personal information that you may provide in your response;
- c) promptly add updated or new personal information to existing records;
- d) regularly audit our contact lists to check their accuracy.

## 12 CORRECTING YOUR PERSONAL INFORMATION

You may ask us to update or correct the personal information we hold about you at any time. We will take reasonable steps to verify your identity before granting access or making any corrections to your information. We also have obligations to take reasonable steps to correct personal information we hold when we are satisfied that it is inaccurate, out- of-date, incomplete, irrelevant or misleading for the purpose for which it is held.



### 13 UPDATES TO THIS PRIVACY POLICY

We may review and update this Privacy Policy from time to time. Updated versions of this Privacy Policy will be published on the website and made available upon request.

### 14 HOW TO MAKE A COMPLAINT

If you wish to make a complaint regarding our Privacy Policy or the manner in which we have handled your personal information, you may write to Crossway Secretary at the address provided in the “How to Contact Us” section below.

If we receive a complaint, we will take the following steps:

- If we consider necessary, request further information from you;
- conduct internal investigations in relation to the matter;
- notify you of the results of our investigation of your complaint and endeavour to do so within 14 days of receiving your complaint, unless it is complex or otherwise requires extensive investigation in which case the period of time may be longer; and
- if we consider necessary, we will take steps to remedy the breach as soon as reasonably practicable

If you are dissatisfied with our response, you may refer the matter to the Office of the Australian Information Commissioner (see [www.oaic.gov.au](http://www.oaic.gov.au))

### 15 HOW TO CONTACT US

All queries can be directed to the Crossway Secretary via:

<b>Email:</b>	<a href="mailto:privacy@crossway.org.au">privacy@crossway.org.au</a>
<b>Telephone:</b>	(03) 9886 3700
<b>Facsimile:</b>	(03) 9886 3711
<b>Post:</b>	Crossway Baptist Church, 2 Vision Drive Burwood East VIC 3

A copy of this Privacy Policy will be made available free of charge and in soft or hardcopy format as requested.