

SAP Privacy Policy

Introduction

1. This policy has been prepared as part of a common governance pack for adoption by those organisations which centrally administer, manage or support the affairs of the Anglican Church Diocese of Sydney (the “**Sydney Anglicans Group**”). It has been adopted by the board of Sydney Anglican Property (“**we**”, “**us**” or “**our**”) as part of the Sydney Anglicans Group.

Purpose

2. This policy summarises how we deal with your personal information. We recognise and respect every person’s right to privacy and confidentiality.

Commitment

3. We are committed to protecting your personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles.
4. By visiting our pages on the Sydney Anglicans website, using any of our services or otherwise providing us with your personal information (or authorising it to be provided to us by someone else), you agree to your personal information being handled as set out in this Privacy Policy.

Definitions

5. For the purposes of this policy, and in accordance with the *Privacy Act 1988* –

Personal Information is information or an opinion about an identified individual or an individual who is reasonably identifiable.

Sensitive Information includes personal information about your health, your race or ethnic origin, political opinions, or religious beliefs.

6. For the purposes of this policy –

Proper administration of the Diocese is any act or practice which is –

- (a) performed pursuant to or under an ordinance or resolution of the Synod or the Standing Committee of the Anglican Diocese of Sydney or a canon of the General Synod of the Anglican Church of Australia,
- (b) reasonably necessary to give effect to an ordinance or resolution of the Synod or the Standing Committee
- (c) a discharge of the duties or exercise of the powers and authorities, however arising, of the Archbishop of Sydney,
- (d) reasonably necessary for the Registry or an officer of the Synod or the Standing Committee to discharge their duties in the central administration of the affairs of the Diocese,
- (e) reasonably necessary for us to provide a service to you, or to arrange for others to provide a service to you, which you have requested or we are required by the Synod or the Standing Committee to provide or arrange, or

- (f) otherwise identified in this Policy as necessary for the proper administration of the Diocese or is incidental thereto.

Collection of personal information

7. We collect and hold personal information about a range of people. We only collect personal information where it is reasonably necessary for the proper administration of the Diocese, the provision of our services, or for arranging others to provide you with a service you have requested, or if required or permitted by law.
8. We may collect your personal information in various ways, including via telephone, our website (including through entry into an online database), in writing (including by email or other electronic means) and/or through online forms/surveys, whether hosted on a third party website or our own.

Sensitive Information

9. Some personal information we collect may also be sensitive information. Among the most common forms of sensitive information we collect is in relation to religious beliefs and values. For example, we may seek information about your religious beliefs (including your assent to a statement of faith), the church you attend and your broader involvement in ministry activities, for the purpose of determining your suitability for election or appointment to a position. See further below in relation to health information.
10. We will only collect sensitive information about you with your consent unless –
- we are otherwise allowed or required by law to collect that information,
 - a reasonable permitted situation arises in accordance with the Australian Privacy Principles, or
 - the information relates to our activities and relates solely to members of the Anglican Church Diocese of Sydney or to individuals who have regular contact with us in connection with our activities.
11. If you provide us with sensitive information about yourself which is necessary for the proper administration of the Diocese or the provision of our services, we will treat this as collection of such information with your consent.

Third Parties

12. In most situations we collect your personal information directly from you. However, we may also collect information from third parties if it is impractical to collect it directly from you. For example, if you are obtaining our services on behalf of your church or parish, we may collect information from the wardens and/or rector of your church. In other cases, we may collect information from a person you have authorised to deal with us on your behalf.
13. We may also seek to collect information about someone else from you (for example, if you hold one of the positions listed in a paragraph above). However, you must not provide us with personal information about another person unless you have that person's consent to do so, have told them that their personal information will be handled in accordance with this Privacy Policy and have told them where they can find a copy of this policy. We may also collect your personal information from publicly available sources.

Unsolicited personal information

14. If we receive personal information about you that we have not requested (unsolicited personal information) we will generally, unless otherwise required or permitted by law, delete or destroy it as soon as practical after receiving it. If you provide us with unsolicited personal information about yourself we may retain this information if it is necessary for the proper administration of the Diocese, the provision of our services or to comply with our legal obligations, or we do so with your consent.

Collection of personal information required by law

15. In certain circumstances we may be required or permitted by law to collect certain personal information about you. For example, we may need to collect your name, residential address, country of residence, date of birth, and other types of personal information to comply with our legislative obligations.

Consequences of not providing personal information

16. You do not have to provide us with your personal information but if you do not provide us with the personal information that we need, you may not be able to fulfil certain roles, or we may not be able to provide services or assistance to you or continue to provide an existing service to you.

Use of personal information

17. We only use personal information which we have collected for the purposes for which it was collected, related purposes that we consider to be within your reasonable expectations or as permitted or required by law.

Direct marketing

18. We generally do not engage in direct marketing, instead we contact individuals for purposes that are required for our business and generally not for the promotion of goods or services. We will only use personal information for the purposes of direct marketing (including fundraising) if:

- we have collected your personal information directly from you and would reasonably expect us to communicate with you in such a way;
- you have provided your consent; or
- it is impracticable to seek consent.

In such situations we will also provide you the ability to opt-out of or unsubscribe from communications.

19. For the avoidance of doubt, we do not regard any communication undertaken for the proper administration of the Diocese, using personal information collected for this purpose, as direct marketing.

Disclosure of personal information

Disclose to other diocesan entities for the proper administration of the Diocese

20. Any personal information provided to us may be disclosed to other entities of the Anglican Church Diocese of Sydney to enable the proper administration of the Diocese, except to enable an entity soliciting donations from you.
21. We may also disclose your personal information to government bodies, regulators, law enforcement agencies and any other parties where authorised or required by law.

Disclosure to others

22. We may disclose your personal information to third party service providers, agents or contractors from time to time if and to the extent this is reasonably necessary for us to provide a service you to you, or procure a service for you, which you have requested, or we are required by the Synod or the Standing Committee to provide or procure. If we do this, we generally require those parties to protect your personal information in the same way we do.
23. We may also disclose your information to any other entities identified at the time of collecting your personal information or which you subsequently request or expressly consent to us providing with your personal information.

Disclosure to overseas recipients

24. In general we do not disclose your personal information to any overseas recipients, although there may be some specific exceptions to this, for example if making an international transaction on your behalf. On such occasions we will seek your consent to disclose your personal information and will outline to you who it will be disclosed to and how it will be used by them.

Sensitive information

25. Any personal information that is sensitive information will only be disclosed in accordance with the preceding paragraphs where doing so is –
- (a) within the primary purpose of its collection,
 - (b) a directed related secondary purpose and within your reasonable expectations,
 - (c) with your consent, or
 - (d) otherwise permitted by law.

Storage and Security

26. We take reasonable steps to protect any personal information that we hold from misuse, interference and loss and from unauthorised access, alteration and disclosure. For example, we implement the following security measures –
- security procedures for access to our internal office areas;
 - security procedures within our offices (including, locked cabinets and file rooms for personal information that is particularly sensitive);
 - Information Technology security procedures including password protection, firewalls, intrusion detection, cyber threat detection, vulnerability scanning, security permissions, file audit trails, and site monitoring; and
 - a requirement for all staff to maintain confidentiality except insofar as disclosure is reasonably necessary for the proper performance of employment duties (as outlined in workplace policies and/or employment contracts).
27. Your personal information may be stored in a third-party data centre used or operated by a service provider that is located overseas. We access this data through the Internet.

Data Breaches

28. We take seriously any unauthorised access to, disclosure, or loss of personal information (data breach). The *Privacy Amendment (Notifiable Data Breaches) Act 2017* (Cth) requires us to let you know if your information is impacted by certain data breach incidents. We will communicate to you if:
- there is unauthorised access to or disclosure of your personal information, or if your personal information is lost; and
 - there is a reasonable chance that this could cause you serious harm, which may include physical, psychological, emotional, economic or reputation harm; and
 - we have been unable to remedy the breach in a manner consistent with the Act.
29. Sydney Anglican Services has a Data Breach Response Plan and may be required to communicate with the Office of the Australian Information Commissioner (**OAIC**).

Access

30. You may access personal information we hold about you, subject to certain legal restrictions or exemptions. Where such restrictions or exemptions exist, we will advise you of those reasons at the time of your request.

31. If you wish to access the personal information we hold about you or request that it be corrected or updated, you should contact our Group Privacy Officer using the contact details below.
32. While we do not charge you for a request for accessing your personal information you should be aware that we may charge a reasonable fee (which will be notified to you once you make a request) for our time and expenses in the following circumstances –
 - if an extended amount of time is required to collate and prepare material for you; or
 - if you wish to have your files photocopied for you.

Quality of Information and Correction

33. We take reasonable steps to ensure that the personal information we hold about you is accurate, complete and up-to-date. However, we also rely on you to advise us of any changes to your personal information in a timely manner.
34. If there are any changes to your personal information or if you believe the personal information we hold about you is not accurate, complete or up-to-date or is misleading, please contact the Sydney Anglicans Group staff member responsible for our provision of services to you, or if you are unsure who this person is, our Group Privacy Officer using the contact details below, so that we can update our records accordingly. In some cases we may refuse to make changes in the manner requested by you, and in such case will provide you with a written notice that explains the reasons for our refusal. In such circumstances you may provide us with a statement in respect to the need for correction and ask us to associate the statement with the information in question.

Social Media

35. We may use social media or social networking services to communicate with the public about our work. When you communicate with us using these services we may collect your personal information, however we only use social media to help us to communicate with you and the public. Each social media company and network will also handle your personal information for their own purposes, under their own privacy policies.

Anonymity & Pseudonymity

36. For most of our functions and activities we usually need your name and contact information and enough information about the particular matter to enable us to fairly and efficiently handle your inquiry, request, complaint or application, or to act on your report.
37. However, if you desire to maintain anonymity in your interactions with us, we will make provision where reasonable to allow you to interact with us anonymously or to use a pseudonym. For example, if you contact us with a general question, we may opt to not ask for your name unless we need it to adequately handle your question.

Collection Of Information - Website

38. Any public website we use for the purposes of our business is hosted in Australia. There are several ways in which we may collect information through our website:

Web Analytics

39. We use Google Analytics to collect data about your interaction with our website. The main purpose of collecting your data in this way is to improve your experience when using our site. We also use this data to understand and report on which content pages and downloads are accessed by visitors. We generally do not use statistical analytics to track or collect Personally Identifiable Information of visitors to our site.

Cookies

40. Cookies are small data files transferred onto computers or devices by websites for record-keeping purposes and to enhance functionality on the website. Most browsers allow you to choose whether to accept cookies or not. The information generated by the cookie about your use of the website (including your IP address) may be transmitted to Google. If you do not wish to have cookies placed on your computer, please set your browser preferences to reject all cookies before accessing our website.

Health information and employee records

41. Health information is sensitive information for the purposes of the *Privacy Act 1988*. Health information is also regulated by the *Health, Records, and Information Privacy Act 2002*. If we collect, use or disclose health information, we will comply with the requirements of that Act.
42. If we employ people, in certain circumstances we will be exempt from the provisions of the *Privacy Act 1988* in relation to our handling of the employment records of current and former employees. The exemption applies to any act or practice we undertaken if it is directly related to -
 - (a) a current or former employment relationship between us and an individual, and
 - (b) an employee record (as defined in the Act) held by us relating to the individual.

Complaint Handling

43. If you wish to make a complaint about a breach of this Privacy Policy or Australian Privacy Principles you can contact us using the contact details below.
44. You will need to provide us with sufficient details regarding your complaint together with any supporting evidence.
45. We will refer your complaint to our Group Privacy Officer who will investigate and determine the steps (if any) that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation within 30 days of the date your complaint is made or the date you provided us with any additional information.
46. If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner via www.oaic.gov.au.

Changes to the Privacy Policy

1. We may update this Privacy Policy from time to time so please review it periodically on the Sydney Anglican Property website at <https://sap.sydneyanglicans.net/privacy-policy/> for any changes.
47. Your continued use of our services (including online services), requesting our assistance or the provision of further personal information to us (directly or via an authorised person) after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

Contact us

If you have a query relating to this Privacy Policy or wish to make a complaint, please contact us using the following contact details –

The Group Privacy Officer
Sydney Anglicans
PO Box Q190
QVB Post Office NSW 1230

Phone: 02 9265 1555

Email: privacy@sydney.anglican.asn.au

Policy Status

Date	Comment
22 May 2025	Group policy adopted by Board