



## PRIVACY POLICY

### 1. PURPOSE

This policy aims to ensure all personal information is managed in accordance within the Australian Privacy Principles contained within the Privacy Act 1988.

The Policy outlines WWF-Australia's ("WWF") approach to privacy and how it collects, uses, discloses, de-identifies and protects personal information; the rights of individuals to access the personal information which WWF holds about them and the process for making a complaint regarding the handling of information obtained and held by WWF.

WWF considers the lawful and correct treatment of personal information as critical to its mission and reputation.

### 2. POLICY

WWF respects information privacy and values and respects all individuals and organisations seeking to donate time, money or resources. It recognises its legislated responsibilities and operates within the Australian Privacy Principles (APPs).

### 3. SOURCES OF AUTHORITY

Below are details of the Federal and State legislation pertaining to Privacy.

#### Federal Legislation

*Privacy Act 1988*

### 4. SCOPE

This policy applies to all WWF staff members and volunteers at all WWF workplaces.

WWF's handling of the employee records of its employees in a way which is directly related to a current or former employment relationship is exempt from the Privacy Act.

### 5. DEFINITIONS

<b>Personal Information</b>	Information or opinion about an individual, whether true or not and whether recorded in a material form or not. Examples include a person's name, address, telephone number and date of birth or more complex information like financial details or a marketing profile.
<b>Record</b>	A document, database or pictorial representation of a person in an electronic or paper file, whether held by us or someone else on our behalf. Includes information relating to race, membership of organisations (including political trade and professional organisations and trade unions), sexual orientation, religious and political beliefs and criminal records. Health information is a type of sensitive information and subject to added restrictions.
<b>Sensitive Information</b>	Sensitive information may not be collected without consent unless an exception to this rule is available. For example, consent to collect sensitive information is not required in establishing or defending a legal claim. WWF does not generally collect sensitive information, but if it does it will ask for consent if required by



law to do so.

**Commonwealth  
Government  
Identifier**

A number or a word, or a combination of numbers and letters, assigned by a federal government agency to identify an individual uniquely for the purposes of the agency's operations. For example, tax file numbers, Medicare and pension numbers are identifiers.

**Employee  
records**

Records of personal information relating to an individual's employment with an organisation and include information about health and performance, terms of employment, resumes, disciplinary records and financial details.

**Privacy Officer**

WWF's Privacy Officer is the Fundraising Director

## 6. RESPONSIBILITIES

6.1. **Executive Management** is responsible for:

- Ensuring that WWF and all Managers and staff members comply with all relevant legislation and WWF policies.

6.2. **People and Culture** are responsible for:

- Ensuring that Managers and staff members comply with legislation and WWF policies.
- Assisting managers to develop and deliver training on policies to managers, staff, volunteers, partners and contractors (as applicable to the Policy).
- Providing Managers and staff with support and assistance in complying with this policy.

6.3. **Managers** are responsible for:

- Ensuring that they comply with relevant legislation and WWF policies
- Ensuring their staff are aware of and comply with the requirements of this policy
- Providing the Privacy Officer with all requests for disclosure of personal information
- Forwarding privacy related complaints to the Privacy Officer
- Seeking support and assistance from the Privacy Officer as required
- Advising People & Culture of breaches of the legislation or policy

6.4. **All staff** are responsible for:

- Ensuring that they comply with relevant legislation and WWF policies
- Maintaining clear desk policies
- Maintaining the confidentiality of personal information
- Verifying the identity of individuals seeking personal information
- Recording contact with supporters on the database



- Accepting requests for personal information from supporters
- Forwarding privacy related complaints to the Privacy Officer
- Maintaining the confidentiality of passwords and access codes
- De-identifying personal information no longer required

## **7. PROCEDURES**

The following procedures are followed in relation to the Australian Privacy Principles (APPs).

### **7.1. The type of information collected**

Personal information collected includes:

- contact details (name, address, telephone numbers, email, etc.);
- complaint details;
- donation history; and
- credit card and/or bank account details.

The types of sensitive information collected by WWF includes records of communications, which may include from time to time, information provided to WWF or collected from others. This includes, but is not limited to, the following types of information:

- tax file numbers;
- personal financial information;
- personal credit card data; and
- any idiosyncratic or personal information we obtain from a person or others about that person.

### **7.2. Why private information is collected**

WWF embarks on a number of projects both within Australia and globally to conserve the natural environment. In order to fund such projects WWF are actively involved in fundraising and promoting the organisation to potential donors.

Information about people is collected so as to allow WWF to communicate with them, introduce them to WWF, inform them of WWF's work and encourage donations so we can continue to embark on our conservation projects.

WWF only collects the personal information it needs to provide and market its services. WWF also uses the information to enhance and develop its relationship with its supporters. WWF may share personal information with entities that perform services for the organisation.

WWF collects information needed to deliver and improve the services provided. This includes processing donations, providing receipts, maintaining accurate details of our donors' history and sending information about WWF's work.

Information may also be used for the following purposes:



- for the immediate reason for which it was provided to WWF (for example, to enable a process for requests, payments, registration, subscriptions, etc.);
- to maintain contact about WWF's work, to report on WWF's work, or to encourage education on WWF's work; and
- any other purpose directly related to WWF's work and for which consent has been provided (where it is reasonably required by law).

WWF does not rent or sell information. In order for WWF to find new supporters, like-minded organisations both in Australia and overseas may allow WWF to contact their mailing list. In return WWF allows these organisations to mail WWF supporters with information WWF believes may be of interest to the supporter. WWF will remove individuals from this process if it is requested by the individual.

WWF takes reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations when handling personal information.

If an individual does not want their personal information disclosed to another organisation, the individual can notify WWF either at the time the information is collected or any later time.

If an individual asks where WWF obtained their information from, WWF will usually be able to tell them. Upon receipt of such a request, staff are to first consult with the Privacy Officer.

Sometimes WWF may be legally required to disclose information, for example, to government departments.

WWF may also sometimes share non-personal, non-sensitive and de-identified information with research organisations.

WWF will use fair and lawful ways to collect personal information. WWF takes reasonable steps not to make unreasonably intrusive enquiries.

### **7.3. How private information is collected**

WWF may collect information from an individual either directly or from third parties. Information collected from third parties may be by formal or incidental means.

Where WWF collects information from third parties and it is not personal information that is contained in a Commonwealth record, WWF will take reasonable steps to destroy or de-identify the information as required by law.

WWF collects personal information about supporters, volunteers, employees, contractors and visitors to our events. WWF collects information in the following ways:

- face to face contact;
- electronically including through our website and online surveys;
- via social media messages or conversation;
- during phone calls;
- voice or image recordings;
- whilst delivering and administering services at our facilities;
- from forms, coupons and other correspondence (both in writing and electronically); and



- exchanging information with trusted like-minded organisations

WWF will generally obtain consent before collecting sensitive information unless the collection is required by law or to establish, exercise, or defend a legal or equitable claim, or it is necessary to prevent or lessen a serious or imminent threat to the life or health of the person who is the subject of the information.

#### **7.4. How personal information is used**

WWF only uses personal and sensitive information for the reason it was collected as set out above and for the purpose(s) for which it was collected, or as otherwise permitted by law.

WWF will not disclose the above information collected to affiliates or third parties without consent from the individual.

#### **7.5. Use without consent**

Situations in which WWF may use or disclose information without an individual's consent include where:

- WWF reasonably believes that use or disclosure is necessary to reduce or prevent a threat to a person's life or health or a serious threat to public health or safety;
- WWF is investigating or reporting on suspected unlawful activity;
- the use or disclosure is required or authorised by law; or
- WWF reasonably believes that the use is necessary for law enforcement, public revenue protection, prevention and remedying of seriously improper conduct, or preparation or conduct of court or tribunal proceedings, either by or on behalf of an enforcement body.
- If WWF- Australia uses or discloses information on the last of these grounds it will make a written note of such use or disclosure.

#### **7.6. Accessing and correcting personal information**

An individual can access their information by asking WWF. Occasionally, WWF may need to refuse this request to access information, for example, where granting access to the individual would infringe someone else's privacy.

When an individual requests access, WWF will ask for some form of identification to be provided so that WWF can ensure that the individual is the person to whom the information relates.

In some cases, WWF may also ask the individual to pay a reasonable fee to cover the cost of access.

If an individual has a question about this privacy policy or wishes to access their personal information WWF can be contacted:

Via email [enquiries@wwf.org.au](mailto:enquiries@wwf.org.au)

Via phone call from 9am - 5pm Monday to Friday at Sydney time:

Toll Free: 1800 032 551

Phone: +61 2 8228 6800

Fax: +61 2 9281 0363

WWF will aim to respond within 28 days of receiving a request.



If WWF is not able to help with the request, the individual will receive a written explanation as to why.

WWF may deny a request for access if it reasonably believes any of the following circumstances apply:

- a. it would pose a serious and imminent threat to the life or health of any person;
- b. the privacy of others would be unreasonably affected;
- c. the request is frivolous or vexatious;
- d. the information relates to existing legal proceedings with the person who is the subject of the information and would not be accessible through discovery;
- e. providing access would prejudice negotiations with the person who is the subject of the information by revealing our intentions regarding those negotiations;
- f. providing access would be unlawful or denying access is required or authorised by law;
- g. providing access would be likely to prejudice an investigation of unlawful activity or law enforcement, public revenue protection, prevention and remedying of seriously improper conduct, or preparation or conduct of court or tribunal proceedings, either by or on behalf of an enforcement body;
- h. an enforcement body performing a lawful security function requests denial of access to protect national security; and
- i. where evaluative information generated by us in making a commercially sensitive decision would be revealed by providing access. In this situation WWF may provide an explanation for the commercially sensitive decision instead.

If WWF denies a request for access it will usually explain why.

Where WWF is not required to provide access because of one of the reasons listed above (or some other reason under the Privacy Act such as an exemption), WWF will consider, if it is reasonable to do so, whether an individual's access needs may be met by permitting access to records through a mutually agreed intermediary.

### **7.7. Complaints about a breach of your privacy**

All complaints received by WWF are treated seriously.

If an individual is concerned about how WWF has collected or managed their personal information WWF requests that the individual follows the procedure set out below:

- I. Contact WWF on 1800 032 551 and ask for our Privacy Officer.
- II. Download and complete the 'Information Privacy Complaints Form' available on our website here: [http://www.wwf.org.au/privacy\\_policy/](http://www.wwf.org.au/privacy_policy/)
- III. Submit your completed 'Information Privacy Complaints Form' to [enquiries@wwf.org.au](mailto:enquiries@wwf.org.au) or post to WWF Privacy Officer, Reply Paid 528 Sydney NSW 2001. In order to effectively address your complaint, we may request further information from you about your complaint and the reasons behind it.

After we receive all the information we need from you, allow us approximately 28 days to address your complaint.



If the individual is not satisfied with how their complaint has been handled, they can also contact the Office of the Australian Information Commissioner (OAIC) on <http://www.oaic.gov.au>

The OAIC is a government body independent of WWF. It has the power to investigate complaints about possible interference with an individual's privacy.

Complaints may be taken to the OAIC before WWF is notified. The OAIC has the power to:

- Investigate a complaint an individual has made to the OAIC;
- investigate on the OAIC's initiative an act or practice that may be a breach of privacy (even if no complaint has been made);
- seek an order (injunction) from the court to stop conduct that does or would breach the Privacy Act; and
- involve the Australian Competition and Consumer Commission in its investigations.

If a complaint about WWF is taken to the Federal Privacy Commissioner and there is a dispute over whether WWF has complied with the Act the issue is to be presented to the Privacy Officer. The Privacy Officer will immediately advise the CEO that a complaint has been lodged.

#### **7.8. Disclosing your personal information overseas**

Occasionally WWF may use overseas facilities or contractors to process or back-up information or to provide other services.

As a result, WWF may disclose personal and sensitive information to our overseas facilities or contractors for these purposes. However, any disclosure of personal and sensitive information overseas does not change WWF's commitment to safeguarding an individual's privacy.

The countries to which we may disclose personal information include but are not limited to Britain and China. We do not otherwise disclose or transfer personal information overseas.

#### **7.9. Trans-border data flows**

WWF will not transfer personal information to someone (other than WWF or the individual who is the subject of the information) in a foreign country, unless one of the following circumstances applies:

- WWF reasonably believes that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the APPs
- the individual has consented to the transfer;
- the transfer is necessary to perform the contract between the individual and WWF or the individual and a third party;
- the transfer is for the individual's benefit and it is impractical to get consent and it is likely consent would be given;
- WWF has taken reasonable steps to ensure those to whom WWF transfers the personal information will not hold, use or disclose the information inconsistently with the APPs.
- As the WWF Network is international, personal data may be made available internationally, including in countries which do not have data protection laws or laws which provide equivalent protection to the



Australian Privacy Principles. The law requires that WWF ensures that those to whom WWF transfers individuals' data protect it and their privacy to the same standard as WWF does.

#### **7.10. Data security**

WWF takes reasonable steps to ensure the security of personal and sensitive information held by WWF and to protect it against loss, misuse or unauthorised access, destruction, use, modification or disclosure.

WWF takes appropriate physical and personnel security measures to protect written material on its premises and will use appropriate security procedures to deny access to electronic records including internal data access control and protective measures to provide protection against intrusion from external sources.

- WWF permanently de-identifies personal information where reasonable and possible; and
- Destroys personal information once there is no longer a legal or business need for WWF to retain it.

#### **7.11. Computer and network security**

WWF's IT systems are protected and comply with applicable security standards.

Only authorised personnel are permitted to access these details.

Access control for authorised users are maintained by providing passwords for each network user, passwords for specific programs, and 'departmental only' access to identified information and databases.

#### **7.12. Office security – Access control for office entry**

All staff are trained in the relevant security for their office. Alarm access codes and passwords are only provided to staff that open or close the office or those requiring out of hours access. Staff do not under any circumstances provide these access codes to non-WWF personnel without the express approval of Executive Managers.

Staff requiring out of hours access to offices avail themselves of the relevant procedures for opening and closing the office.

A log of office access keys is held in each office. This log is regularly checked for accuracy. Staff who hold an office access key are responsible for the whereabouts of these keys. Staff do not under any circumstance provide these access keys to non-WWF personnel without the express approval of the WWF Directors.

Any office security breach is reported immediately to the CEO, People & Culture Director and CFO.

#### **7.13. Clean desk policy**

All staff involved in handling documentation containing an individual's personal details or banking details are required to follow a clean desk policy before leaving the office each day. All documentation is removed from desktops and stored in locked drawers or cabinets.

Reception staff are expressly aware of documentation that may be seen by the public upon entering the office. Covered in-trays and locked drawers or cabinets are utilised.

#### **7.14. Identifiers**

WWF intends to adopt, use or disclose Commonwealth Government identifiers only where permitted to do so.

If WWF is required to collect a government identifier in providing our services to individuals, WWF will not



use this number as our own identifier to identify the individual.

- WWF will not disclose a government identifier to any other person, except as required by law or if the disclosure is requested in writing by the individual to whom the identifier pertains.
- Australian Registered Body Numbers (ARBN) and Australian Business Numbers (ABN) are not covered by this Privacy Principle and WWF can use those numbers to identify an individual.

#### **7.15. Anonymity**

It is the right of the individual to be dealt with anonymously, provided that is it lawful and practicable.

WWF will try to accommodate a request for anonymity wherever possible; however WWF notes that in some circumstances, this may prevent WWF from practically and effectively communicating with an individual. If this is the case WWF will notify the individual.

WWF can accept gifts and other forms of support anonymously. However, provisions contained in the Income Tax Assessment Act require WWF to collect the name of the donor if the donor requires a tax deductible receipt.

#### **7.16. Cookies and links to other websites**

When an individual visits WWF's website a record of their visit is logged. The following data is supplied by an individual's browser:

- The individual's IP address and/or domain name;
- The individual's operating system (type of browser and platform);
- The date, time and length of the individual's visit to the website; and
- The resources accessed by the individual and the documents that were downloaded.

This information is used to compile statistical information about the use of WWF's website. It is not used for any other purpose.

If an individual does not want 'cookies' to be used, the individual should adjust or disable their browser settings.

WWF's website may contain links to third party websites, and third party websites may also have links to WWF's website.

WWF's privacy policy does not apply to external links or other websites.

The operators of other websites may collect an individual's personal information.

WWF encourages individuals to read the privacy policies of any website they link to from WWF's website.



**8. CONFIDENTIALITY AND DOCUMENT CONTROL**

This policy is available on Habitat for all employees.

**9. POLICY REVIEW**

The Chief Financial Officer will review this policy every 2 years.

**10. APPROVAL**

**Signature:**

**Name:**

Dermot O'Gorman

**Title:**

Chief Executive Officer

**Date of Issue:**

04.11.14

**Date of Review**



# Information Privacy Complaint Form

EXAMPLE ONLY – SEE ATTACHMENT

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This form is to assist you in making a complaint about the handling of your personal information by the World Wide Fund for Nature Australia ('WWF-Australia') or a contracted service provider or partner of the organisation under the Information Privacy Act 2000.

- Complaints may only be lodged in writing after you have been unable to resolve the issue directly with WWF-Australia's Privacy Officer.
- You will receive acknowledgment of your lodged complaint within three (3) business days upon World Wide Fund for Nature Australia (WWF-Australia) having received your complaint/appeal.
- WWF-Australia may ask you for further information in relation to your complaint.
- WWF-Australia will endeavour to resolve your complaint within a reasonable timeframe usually twenty eight (28) business days upon receipt of the written complaint and all further information in relation to it or as soon as practicable. However, in some cases, particularly if the matter is complex the resolution may take longer.
- Please complete all fields on this form and submit to [enquiries@wwf.org.au](mailto:enquiries@wwf.org.au)

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## About You - the Complainant

**Prefix: Mr/Mrs/Miss/Ms** Click here to enter text.  
**Full Name** Click here to enter text.  
**Address** Click here to enter text. **Postcode** Click here to enter text.  
**Email** Click here to enter text.  
**Contact phone number:** (Click here to enter text.) **during business hours**

Please advise our office as soon as possible if any of your contact details change.

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## The Respondent - who you are complaining about

**I am complaining about** Click here to enter text.

**Organisation** Click here to enter text.

**Individual/s involved (if known)** Click here to enter text.

**Address** Click here to enter text. **Postcode** Click here to enter text.



## Information Privacy Complaint Form

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### Your Complaint

Please provide details of the nature of your involvement with The Respondent.

[Click here to enter text.](#)

Does your complaint involve behaviour by a particular staff member of The Respondent? If so please provide the name of the staff member involved and any information about the staff member's involvement.

[Click here to enter text.](#)

Please describe how you believe your information privacy has been breached?

[Click here to enter text.](#)

Please provide details regarding how the complaint has affected you.

[Click here to enter text.](#)

Please give a brief description of the events (what happened, where it happened and who did it) which you allege were an interference with the privacy of your information.

[Click here to enter text.](#)

Please advise if you have lodged a complaint about this issue before?

[Click here to enter text.](#)

Please advise if you have reported this to any other organisation/s.

[Click here to enter text.](#)

What is your expected outcome?

[Click here to enter text.](#)

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### Your Signature

I have attached additional information with the Privacy Information Complaints Form

If emailing directly to [enquiries@wwf.org.au](mailto:enquiries@wwf.org.au), a signature is not required.