

	Privacy Policy and Procedure	
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	Approved By: Board	

1.0 INTRODUCTION

Our Rainbow House is committed to protecting the privacy of personal information which our organisation collects, holds and administers. This Privacy Policy explains how we collect, use, disclose, and store your personal information in accordance with the *Privacy Act 1988 (Cth)*, the *Australian Privacy Principles (APPs)* and the *Payment Card Industry Data Security Standard*.

By using our services or interacting with us, you consent to the collection, use, and disclosure of your personal information as outlined in this policy.

2.0 REFERENCE

Australian Privacy Principles

Our Rainbow House Record Keeping Policy and Procedure

Payment Card Industry Data Security Standard

Privacy Act 1988 (Cth)

The Constitution of Zambia (Amendment) Act, 2016

The Data Protection Act (2021) - Zambia

3.0 DEFINITIONS

Beneficiary shall mean any person, of any age, who benefits directly from Our Rainbow House programs. This includes students, staff members, guardians, caregivers and other program participants.

Personal Information is any information which directly or indirectly identifies a person including but not limited to name, address, contact information, date of birth, image, health status and employment history.

Representative shall mean any board member, staff member, volunteer, student placement, apprentice, contractor, sub-contractor or any other person who is caused to undertake tasks or duties on behalf of Our Rainbow House.

Stakeholder means a person or group having an interest in the performance or success of our organisation.

Third Party means involving or relating to a third person or organisation less directly involved in a matter than the main people or organisations

4.0 SCOPE

This Privacy Policy applies to all personal information collected, used, disclosed, and managed by Our Rainbow House. It covers the following:

- **Individuals Covered:** Donors, Sponsors, Representatives, Beneficiaries, Website Visitors, and Third Parties interacting with Our Rainbow House.
- **Types of Personal Information:** Personal Identifiable Information (PII), Financial Information, Sensitive Information, Employment Information, and Online Data (e.g., cookies and analytics).
- **Activities Covered:** Donations, Marketing, Volunteer and Sponsor Management, Program Delivery, Website Usage, and Legal Compliance.

- **Geographic Scope:** Applies within Australia and for international transfers, ensuring compliance with Australian and local laws (e.g., in Zambia).
- **Exclusions:** Does not cover third-party information or publicly available data (e.g., aggregated or anonymized data).

5.0 PURPOSE

The purpose of this Privacy Policy is to:

- ensure Our Rainbow House meets our legal obligations concerning privacy and personal data protection;
- promote transparency and build trust with our stakeholders by clearly communicating our organisation's privacy practices.
- safeguard the rights of individuals whose personal data is handled by the Our Rainbow House, providing them with control over their information.

6.0 RESPONSIBILITIES

Board: Oversee overall policy implementation and compliance.

Director: Enforce policy across departments, allocate resources, and manage privacy breaches.

Compliance Officer: Ensure implementation and monitoring of the policy, manage privacy risks, and act as a point of contact for privacy matters.

Australian and Zambian Staff: Secure personal data, ensure system security, and protect data transfers, handle employee personal information, ensure training, and manage employee data access requests, collect and use marketing data with consent and transparency.

All Representatives: Follow privacy procedures, maintain confidentiality, and report breaches.

Third-Party Providers: Ensure compliance with this Privacy Policy when handling personal information.

7.0 POLICY STATEMENT

At Our Rainbow House, we are committed to safeguarding and respecting the privacy of the personal information entrusted to us. We recognize the importance of personal privacy and are dedicated to maintaining the confidentiality and security of all personal data we handle.

In line with the **Privacy Act 1988 (Cth)**, the **Australian Privacy Principles (APPs)**, and the **Data Protection Act (2021 - Zambia)**, this Privacy Policy explains how we collect, use, store, and protect personal information. It also outlines how we meet our legal and ethical obligations to respect the privacy rights of individuals.

We are committed to:

- **Transparency:** Providing clear, concise, and accessible information regarding how personal data is collected and used.
- **Data Minimization:** Collecting only the personal information necessary for the purposes outlined in this policy.
- **Security:** Implementing appropriate technical and organisational measures to protect personal data from misuse, unauthorised access, or disclosure.
- **Respecting Rights:** Ensuring individuals can exercise their privacy rights, including accessing, correcting, or requesting the deletion of their personal data.
- **Compliance:** Adhering to applicable privacy laws and regulations, and ensuring our practices are in line with best practices for data protection.

By using our services, engaging with our programs, or interacting with our website or other digital platforms, you acknowledge that you have read and understood this policy and consent to the collection, use, and disclosure of your personal information as described herein.

We will review this policy regularly to ensure it remains up to date with legal requirements and organisational practices. If you have any concerns or questions about how your personal information is handled, or if you wish to exercise your privacy rights, please contact us using the details below.

8.0 PROCEDURE STATEMENT

Personal Information We Collect

We collect personal information that is necessary for us to carry out our functions and activities. The types of personal information we may collect include:

- **Contact Information:** Name, address, email address, phone number.
- **Identification Information:** Date of birth, gender, and other information required for specific services.
- **Financial Information:** Payment details (credit card, bank account) for donation processing.
- **Sensitive Information:** Information about health or other sensitive matters (with consent where applicable).
- **Other Information:** Any other details you voluntarily provide us (e.g., through surveys, feedback forms, or applications).

How We Collect Personal Information

We collect personal information in the following ways:

- **Directly from you:** When you provide it to us via forms, emails, calls, or in person.
- **Automatically:** Through cookies or analytics tools when you use our website or interact with our digital platforms.
- **From Third Parties:** When we receive information about you from partners, sponsors, or external organisations.

Purpose of Collecting Personal Information

We collect personal information for the following purposes:

- **To Provide Our Services:** To process donations, support our educational programs, or manage sponsorships.
- **To Communicate with You:** To send you updates, newsletters, and marketing communications about our programs, events, and initiatives.
- **To Improve Our Services:** To conduct surveys, collect feedback, and analyse data to improve the effectiveness of our operations.
- **To Comply with Legal Obligations:** To meet our obligations under applicable Australian, Zambian and international laws.

We will not use your personal information for purposes unrelated to the above without your consent.

Disclosure of Personal Information

We may disclose your personal information to:

- **Service Providers:** Trusted third-party service providers that assist us in providing services, such as payment processors, email marketing platforms, or IT support.
- **Legal and Regulatory Authorities:** When required by law, we may disclose your information to comply with legal obligations or respond to lawful requests from government authorities.
- **Partners and Sponsors:** If you are a sponsor or partner, your personal details may be shared with the relevant parties for program management purposes.

- **Overseas Recipients:** Some of our partners or service providers may be located overseas, and personal data may be transferred to those locations. We will take reasonable steps to ensure your data is handled in accordance with Australian, Zambian and international privacy laws.

We will not share your personal information with any other third parties unless you consent to it, or it is necessary for the purposes outlined in this policy.

Security of Personal Information

We take reasonable steps to protect your personal information from misuse, interference, loss, unauthorized access, modification, or disclosure. These steps include:

- **Physical Security:** Securing physical access to personal information.
- **Digital Security:** Using encryption and secure networks to protect personal data.
- **Third Party Security:** Ensuring any external providers comply with current privacy legislation.
- **Staff Training:** Ensuring that staff members understand the importance of maintaining privacy and confidentiality.

Despite these efforts, no method of data transmission over the internet or electronic storage is 100% secure. If you have any concerns about the security of your personal information, please contact us.

Access to and Correction of Personal Information

You have the right to access the personal information we hold about you. If you would like to access or correct your information, please contact us at admin@ourrainbowhouse.org.au.

We will respond to your request as quickly as possible.

If any personal information we hold about you is incorrect or outdated, we encourage you to notify us so that we can update or correct it.

Use of Cookies and Tracking Technologies

Our website and other digital platforms may use cookies and other tracking technologies to enhance user experience, analyse trends, administer the site, and gather demographic information. Cookies are small text files stored on your device that enable us to recognize your preferences and improve your interactions with our website.

You can disable cookies in your browser settings, but this may affect the functionality of the site.

Direct Marketing

We may use your personal information to send you marketing communications about our programs, services, or events that we believe may be of interest to you. You can opt-out of receiving such communications at any time by:

- Clicking the "unsubscribe" link in our emails.
- Contacting us directly at admin@ourrainbowhouse.org.au

We will not use your information for marketing purposes without your consent unless permitted by law.

Overseas Transfers of Personal Information

In certain circumstances, we may transfer your personal information to recipients located overseas. We will take reasonable steps to ensure that any overseas recipients handle your personal information in accordance with Australian and Zambian privacy and data protection laws.

If we transfer your data overseas, we will do so only in compliance with current legislation and ensure that appropriate safeguards are in place.

Retention of Personal Information

We will retain your personal information only for as long as necessary to fulfill the purposes for which it was collected or as required by law. Once your information is no longer required, we will securely destroy or de-identify it as per the *Our Rainbow House Record Keeping Policy and Procedure*.

Your Rights Under the Privacy Act

Under the Privacy Act 1988 (Cth), you have the following rights regarding your personal information:

- **Right to Access:** You can request a copy of the personal information we hold about you.
- **Right to Correct:** You can request that we correct any personal information we hold about you that is inaccurate or incomplete.
- **Right to Complain:** If you believe your privacy rights have been violated, you have the right to lodge a complaint with us or the Office of the Australian Information Commissioner (OAIC).

Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. Any changes will be posted on our website, and the revised policy will take effect once posted.

9.0 REVIEW

Date of next review: 30/04/2027