



CATHOLIC DIOCESE  
OF ROCKHAMPTON

# Privacy Policy

# Contents

1. Purpose .....	3
2. Scope .....	3
3. Policy Statement .....	3
4. Principles .....	3
4.1. Types of personal information that the Diocese collects and holds .....	3
4.2. Collecting your personal information .....	4
4.3. Storing personal information .....	4
4.4. Purpose for collecting, holding, using and disclosing information .....	5
4.5. Use and disclosure of information .....	5
4.6. Direct marketing .....	6
4.7. Quality of personal information.....	6
4.8. Access to personal information .....	6
4.9. Correcting personal information .....	7
4.10. Anonymity .....	7
4.11. Data Breach.....	7
4.12. Complaints or queries.....	7
5. References .....	8
6. Schedules.....	8
7. Policy Information.....	8

# 1. Purpose

The Roman Catholic Trust Corporation for the Diocese of Rockhampton (ABN 50 979 741 889) ('Diocese') is committed to complying with its obligations under the *Privacy Act 1988 (Cth)* ('Privacy Act'), including the *Australian Privacy Principles* ('APPs').

The Diocese is committed to respecting your privacy and protecting your rights with respect to your personal information.

# 2. Scope

This policy applies to the Diocese and its ministries including parishes.

This policy may also be used to apply to bodies or committees associated with any of the above, established to progress initiatives under the auspices of the Diocese.

In accordance with the Diocese's Policy & Procedure Framework, where an agency of the Diocese (such as Catholic Education or CentacareCQ) has its own Privacy Policy, that policy will apply to the agency.

# 3. Policy Statement

This policy explains how the Diocese manages and secures your personal information. It also describes the kinds of personal information that the Diocese holds and for what purposes, and how that information is collected, held, used and disclosed.

Please read this policy carefully before you provide the Diocese with any personal information.

# 4. Principles

## 4.1. Types of personal information that the Diocese collects and holds

### 4.1.1. Personal information

The Diocese may collect and hold the following types of personal information about you:

- a) identification information, including your name, postal address, email address, date of birth, Medicare number, driver's licence, Centrelink number, passport and contact details;
- b) bank account details;
- c) financial transactions relating to your Diocesan Development Fund accounts;
- d) balances of accounts held at the Diocesan Development Fund;
- e) tax file number;
- f) marital status; and
- g) any other information that the Diocese considers to be reasonably necessary.

### 4.1.2. Sensitive information

The Diocese may need to collect sensitive information about you. The Diocese will only collect sensitive information about you if:

- a) you consent to the collection of the information and the information is directly related to the Diocese's functions; or
- b) the information relates:
  - (i) to the activities of the Diocese; and
  - (ii) solely to the members of the Diocese, or to individuals who have regular contact with the Diocese in connection with its activities; or
- c) the collection is otherwise permitted under the Privacy Act.

The types of sensitive information that the Diocese collects and holds about you may include:

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- a) information or an opinion about your race or ethnic origin, religious beliefs or affiliations, philosophical beliefs, membership of a profession or trade association, membership of a trade union, sexual orientation and/or practices;
- b) criminal records; or
- c) health information.

#### 4.1.3. Information required by law

The Diocese may also collect personal information about you because the collection of the information is required or authorised by law or a court/tribunal order.

## 4.2. Collecting your personal information

The Diocese will, if it is reasonable and practical to do so, collect personal information directly from you.

The Diocese may collect your information when you:

- a) give the Diocese information over the telephone;
- b) interact with the Diocese electronically or in person;
- c) access its website; and
- d) complete application forms.

On occasion the Diocese may collect personal information about you from other sources where it is necessary to do so. Examples of other sources that the Diocese may collect personal information from include, but are not limited to:

- a) schools;
- b) your relatives;
- c) the Diocese's service providers; and
- d) information that is publicly available on the electoral roll.

If you do not provide the Diocese with your personal information, it may not be able to:

- a) provide you with the product or service you want; and
- b) verify your identity.

#### 4.2.1. Unsolicited personal information

If the Diocese inadvertently collects personal information about you that it did not ask for, the Diocese will check whether it could have collected that information itself. If the Diocese could have collected the information, the Diocese will handle it in the same way it handles other information it collects from you. If:

- a) the Diocese could not have collected the personal information; and
  - b) the information is not contained in a Commonwealth record,
- the Diocese will destroy the information or de-identify the information provided it is lawful and reasonable to do so.

## 4.3. Storing personal information

The Diocese stores your personal information in different ways, including paper and electronic form, via cloud and via Dropbox.

The Diocese treats all personal information as confidential. It will take reasonable steps to ensure personal information is protected from:

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

Some of the ways the Diocese does this are:

- a) confidentiality requirements for employees;
- b) document storage facilities;
- c) security measures for access to systems;
- d) only giving access to personal information to a person who is verified to be able to access that information;
- e) control of access to buildings; and

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- f) electronic security systems, such as firewalls and data encryption, user identifiers, passwords or other access codes, antivirus, antispyware, backup and recovery of systems.

If the Diocese no longer needs your personal information for any purpose, it will take reasonable steps to destroy or permanently de-identify the information, unless:

- a) the information is contained in a Commonwealth record; or
- b) the Diocese is required by law, or a court/tribunal order, to retain the information.

#### 4.4. Purpose for collecting, holding, using and disclosing information

The Diocese collects, holds, uses and discloses your personal information for the following purposes:

- a) to assess your account application(s);
- b) to establish and administer your account(s);
- c) to verify your identity;
- d) to consider any other application(s) made by you for products or services;
- e) for customer relations purposes, including managing the Diocese's relationship with you;
- f) to comply with any applicable laws, regulations or codes of practice;
- g) to comply with any payment systems requirements;
- h) for information technology systems development and testing where the Diocese's internal computer system is upgraded;
- i) for the Diocese's internal operations, including record keeping, risk management, auditing, training, file reviews and account analysis;
- j) to investigate, resolve and prevent complaints;
- k) to make arrangements with other organisations to provide services in relation to the Diocese's products and services (for example, the Diocese may arrange for mailing houses to distribute account statements);
- l) to conduct fraud assessments;
- m) for reporting and data analytics purposes, including for regulatory, management, statistical or research purposes;
- n) direct marketing purposes; and
- o) for any other purpose for which you have given your consent.

#### 4.5. Use and disclosure of information

Personal information the Diocese holds about you that was collected for a particular purpose will not be disclosed for another purpose, unless:

- a) you have consented to the use or disclosure of the information for another purpose; or
- b) the access, use or disclosure is otherwise permitted under the Privacy Act (e.g. you would reasonably expect the Diocese to use or disclose the information for another purpose or the use or disclosure of the information is required or authorised by law or a court/tribunal order).

The Diocese may disclose personal information about you to third parties. Examples of third parties that the Diocese may disclose your personal information to include, but are not limited to:

- a) the Diocese's service providers;
- b) the Diocese's agents, contractors and external advisors (for example, Diocese's lawyers, auditors and Diocesan Development Fund Rockhampton);
- c) any person acting on your behalf, including your legal and financial advisers;
- d) Government and other regulatory bodies, law enforcement bodies and courts as required or authorised by law;
- e) external dispute resolution bodies;
- f) other financial institutions; and
- g) any other person where you have given your consent.

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The Diocese is not likely to disclose your personal information to any overseas recipients.

Where your personal information is disclosed, the Diocese will seek to ensure that information is used, held and disclosed consistently with the Privacy Act and any other applicable laws.

#### 4.6. Direct marketing

The Diocese may use or disclose your personal information (excluding sensitive information) for direct marketing purposes. The Diocese may conduct direct marketing via email, telephone, mail out or any other electronic means.

The Diocese will only use your sensitive information for the purposes of direct marketing if you have consented to the information being used or disclosed for the purposes of direct marketing.

If at any time you decide you do not want to receive any more marketing material from the Diocese, you may:

- a) contact the Privacy Officer in accordance with paragraph 4.12 of this policy; or
- b) opt-out of receiving any more marketing material via any opt-out mechanism contained in the Diocese's marketing correspondence.

All the Diocese's marketing correspondence will display a clearly visible and user-friendly opt-out mechanism. The Diocese may imply consent to receive direct marketing material if you do not use the opt-out mechanism.

If you request to no longer receive direct marketing material the Diocese will process your request within a reasonable period after the request is made.

#### 4.7. Quality of personal information

The Diocese will take all reasonable steps to ensure that any personal information it collects, uses or discloses is accurate, complete, up-to-date and relevant to the Diocese's functions or activities.

If you believe that your personal information is not accurate, complete or up to date, you should contact the Privacy Officer in accordance with paragraph 4.12 of this policy.

#### 4.8. Access to personal information

You can access your personal information unless an exception in the Privacy Act applies. You can request access to your personal information by contacting the Privacy Officer in accordance with paragraph 4.12 of this policy.

Depending on the nature of the request, the Diocese may charge you a small fee for granting you access.

The Diocese will respond to a request for access within a reasonable time (usually 30 days), and give access in the manner requested by you, if it is reasonable and practicable to do so.

Sometimes, it may not be possible for the Diocese to give you access. If the Diocese refuses to give you access, it will:

- a) take reasonable steps to give you access in a manner that meets the Diocese's needs as well as yours;
- b) provide you with written reasons for the refusal provided it is reasonable to do so; and
- c) provide you with the mechanisms available to complain about the refusal.

## 4.9. Correcting personal information

If you think that any personal information the Diocese holds about you is incorrect, inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request the Diocese to correct the information by contacting the Privacy Officer in accordance with paragraph 4.12 of this policy.

The Diocese will take all reasonable steps to correct that information to ensure that, having regard to the purposes for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If the Diocese corrects personal information that has been disclosed to another entity and you ask the Diocese to tell the other entity about the correction, the Diocese will take all reasonable steps to tell the other entity about the correction, unless it is impractical or unlawful to do so.

If the Diocese refuses to correct the personal information, then it will provide you with:

- a) written reasons for the refusal provided it is reasonable to do so; and
- b) the mechanism available to complain about the refusal.

The Diocese must respond to a correction request within a reasonable time (usually 30 days).

## 4.10. Anonymity

You have the option to remain anonymous, or to use a pseudonym when dealing with the Diocese where it is lawful and practical to do so.

## 4.11. Data Breach

A Data Breach is an incident where personal or confidential information, or non-personal information that could be sensitive or commercial is compromised, disclosed, copied, transmitted, accessed, removed, destroyed, stolen or used by unauthorised individuals, whether accidentally or intentionally.

The Diocese of Rockhampton is obligated under the *Australian Privacy Amendment (Notifiable Data Breaches) Act 2017* to notify individuals whose personal information is involved in a data breach that could potentially result in serious harm.

## 4.12. Complaints or queries

If you:

- a) have any issues about the way the Diocese handles your personal information after reading this policy;
- b) become aware of a potential breach of privacy; or
- c) wish to make a privacy complaint,

you are requested to contact the Diocesan Privacy Officer at:

Diocesan Privacy Officer  
Email: [director.dserv@rok.catholic.net.au](mailto:director.dserv@rok.catholic.net.au)  
Telephone: (07) 4887 3070  
Post: PO Box 611, Rockhampton, Qld, 4700  
Visit: 170 William St, Rockhampton, Qld, 4700

If the Diocesan Privacy Officer is unable to resolve the matter, it will be escalated (internally or externally) as appropriate to facilitate resolution.

If you are not happy with the outcome of the Diocese's Privacy Officer's investigation, then you can raise your concern with the Office of the Australian Information Commissioner (OAIC):

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Office of the Australian Information Commissioner  
Telephone: 1300 363 992  
Email: [enquiries@oaic.com.au](mailto:enquiries@oaic.com.au)  
Mail: GPO Box 5218 Sydney NSW 2001  
Web: [www.oaic.gov.au](http://www.oaic.gov.au)

## 5. References

N/A

## 6. Schedules

This policy must be read in conjunction with its subordinate schedules as provided in the table below.

## 7. Policy Information

<b>Subordinate Schedules</b>	
<b>Accountable Officer</b>	Events & Communications Officer
<b>Policy Type</b>	Executive Policy
<b>Approved Date</b>	6/05/2020
<b>Effective Date</b>	13/08/2019
<b>Review Date</b>	13/08/2022
<b>Relevant Legislation</b>	<a href="#">Australian Privacy Amendment (Notifiable Data Breaches) Act 2017</a> <a href="#">Australian Privacy Principles</a> <a href="#">Privacy Act 1988</a>
<b>Related Policies</b>	
<b>Related Procedures</b>	
<b>Related forms, publications and websites</b>	
<b>Definitions</b>	