

## Privacy Policy

### Your privacy is important

At the Australian Boys Choral Institute, we are committed to protecting the privacy of your personal information.

Whilst we are not bound by the Australian Privacy Principles contained in the federal *Privacy Act 1988*, we choose to comply with their content. We are required to comply with more specific privacy legislation in some circumstances, such as the Victorian *Health Records Act 2001*.

### 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 identified or reasonably identifiable. This includes, for example, a person's name, address, financial information, phone number and date of birth.

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection, such as health information about an individual, information relating to a person's racial or ethnic origins, political opinions, religion, sexual preferences or criminal record. We only collect sensitive information where it is reasonably necessary for our functions or activities and either:

- the individual has consented; or
- we are required or authorised by law to do so.

For example, we collect health information in relation to singers so that we can look after their educational, social, emotional and medical wellbeing.

### What kind of personal information do we collect?

The type of personal information we collect and hold includes (but is not limited to):

- information about our singers (including photographs) and their parents and/or guardians, including after they are no longer singing with us;
- information about job applicants for employment, staff members, volunteers and service providers;
- updates of the above information;
- information about people who send us an enquiry or provide us with feedback.

Where we receive unsolicited job applications, these will usually be dealt with in accordance with the unsolicited personal information requirements of the *Privacy Act 1988*.

The Australian Privacy Principles do not apply to an employee record. As a result, this policy does not apply to our treatment of employee records, where the treatment is directly related to a current or former employment relationship between us and employee.

### **How we collect personal information:**

We collect personal information in a number of ways, including:

- in person (for example, at Choir House) and over the telephone;
- through our website;
- through hard copy and electronic correspondence (such as letters and emails);
- on forms, both hard copy and electronic;
- by photographing and taking video of performances and other events.

You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

### **Why do we collect personal information?**

The main purposes for which we collect, hold and disclose personal information are:

- to provide proper education and care for our singers;
- to keep parents/guardians informed about their child's progress and wellbeing;
- to provide proper administration of the ABCI;
- to perform research and statistical analysis;
- to protect the security of our offices, staff, singers, visitors, volunteers and the property held on our premises;
- to promote our concerts and other services and to seek donations, including through direct marketing, campaigns (including online), events and competitions ;
- to recruit staff, contractors and volunteers.

We may also collect, hold, use and disclose personal information for other purposes, such as:

- where we are required to do so by law;
- for insurance purposes;
- other purposes for which you have provided your consent.

### Direct marketing

We may use your personal information to let you know about our products and services (including concerts, campaigns and events), either where we have your express or implied consent, or where we are otherwise permitted by law to do so. We may contact you for these purposes in a variety of ways, including by mail, email, SMS or telephone.

Where you have consented to receiving promotional communications from us, your consent will remain current until you advise us otherwise. However, you can opt out at any time, by contacting us or using the unsubscribe facility that we include in our promotional electronic messages.

### **With whom might we share your personal information?**

We may share your personal information, including sensitive information, with third parties where appropriate for the purposes set out under the “Why do we collect personal information?” section above, including but not limited to:

- our staff;
- government departments and statutory organisations;
- health professionals;
- third-party service providers;
- financial institutions for payment processing;
- in certain instances, singers and/or their parents/guardians.

We will not disclose your personal information outside Australia without:

- obtaining your consent (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

Much of the personal information we hold is stored in secure cloud services, which may include storage in overseas servers.

### **Management and security of personal information**

Our staff are required to respect the confidentiality of personal information and the privacy of individuals.

We have in place steps to protect the personal information we hold from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

We hold personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists, and in paper files.

We take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, up-to-date and complete and (in the case of use and disclosure) relevant;
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the Australian Privacy Principles.

### **Access and correction**

Please contact us if you would like to access or update the personal information that we hold about you, such as your address, email address or telephone number.

We may ask you to verify your identity before processing any access or update requests, to ensure that the personal information we hold is properly protected.

### Enquiries and privacy complaints

If you would like further information about the way we manage the personal information we hold, or if you have any concerns or complaints, please contact us.

Further general information about privacy is available on the website of the Office of the Australian Information Commissioner at <http://www.oaic.gov.au> or by calling the OAIC's enquiry line at 1300 363 992.

### Changes to this policy

We may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing legal environment.

### Document History

Version	Author	Date	Adopted
1.0		14 Jan 2013	
2.0	Tim Staindl	29 Apr 2024	

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**Responsibility:**