

# Parish Privacy Policy

## Scope

The parishes of the Archdiocese of Brisbane (the parishes) operate in South East Queensland as part of the Catholic Church. The privacy of all individuals with whom the parishes interacts is very important and the parishes are committed to protecting all personal information they collect and hold. The parishes do this by handling information in accordance with the Australian Privacy Principles in the *Privacy Act 1988* (Cth) (**Privacy Act**).

This policy sets out how the parishes of the Archdiocese collect, use, disclose and otherwise manage personal information about you through your association with their education, social services and religious activities.

## Collection

### Types of information collected

The parishes typically collect and hold personal information that includes (but is not limited to):

- names, address, telephone number, facsimile number, email address and other contact details;
- date of birth, gender, marital status and occupation;
- financial information, such as donation history and credit card details;
- identification documents, including driver license, passport, Working with Children Check card, proof of age card, and Nationally Coordinated Criminal Health Check;
- affiliations with and belief in the Catholic Church;
- photographs, videos and news stories in respect of Catholic Church related events and activities; and
- information about persons attending events, conferences and retreats, for example individual's dietary requirements, special needs and disabled access requirements (if any).

### Method of collection

Personal information will generally be collected directly from you through the use of any of our standard forms, over the internet, via email, or through a telephone conversation with you. In particular, the parishes may collect personal information about you from application forms, registration forms and from third parties who assist us with carrying out our functions and activities.

There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. The parishes will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

Except as otherwise permitted by law, the parishes only collect sensitive information about you if you or your guardian consents to the collection of the information and if the information is reasonably necessary for the performance of our functions and activities, set out below.

### **Purpose of collection**

The personal information that the parishes collect and hold about you, depends on your interaction with the parishes. Generally, the parishes collect, use and hold your personal information if it is reasonably necessary for or directly related to the performance of the parishes' functions and activities and for the purpose of:

- fulfilling the mission and directions of the Archdiocese and parishes;
- administering the sacraments and pastoral care;
- communicating with you about the services we offer;
- providing services or products to you or someone else you know;
- considering and processing various application and registration forms;
- providing you with information about other services and products that other Catholic Church organisations that we have affiliations with, offer that may be of interest to you;
- seeking donations;
- facilitating internal business operations;
- providing you with information about upcoming events, functions and fundraising activities that may be of interest to you;
- for marketing or promotional purposes;
- distributing de-identified aggregated statistical information for reporting purposes;
- complying with legal or regulatory requirements; and
- dealing with complaints or enquiries.

### **Failure to provide information**

If the personal information you provide to the parishes is incomplete or inaccurate, the parishes may be unable to provide you, or someone else you know, with the services or products you, or they, are seeking.

### **Internet users**

If you access the Archdiocese website, the Archdiocese may collect additional personal information about you in the form of your IP address and domain name.

The Archdiocese website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view so that we may serve you more effectively.

The Archdiocese website may contain links to other websites. The Archdiocese is not responsible for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures.

### **Use and disclosure**

Generally, the parishes only use or disclose personal information about you for the purposes for which it was collected (as set out above). We may disclose personal information about you to:

- a) Archdiocesan parishes, schools and agencies to facilitate internal business processes;
- b) third party service providers, who assist the parishes in operating; and
- c) other parishes located overseas where baptism was received. This disclosure of personal information is for the purpose of recording other sacraments received in accordance with Church Law and these overseas parishes are not required to comply with our privacy policy. At the time of reception by you of other sacraments (after baptism) we will ask you to sign a consent to disclose information overseas, to authorise us to supply personal information about you and your reception of those sacraments to the overseas parish where you were baptised. If you consent to the disclosure of your personal information, Australian Privacy Principle 8.1 will not apply and we will ask you to agree that we do not have to take reasonable steps to ensure that information is treated in accordance with the Privacy Act.

### **Cross-border disclosure**

Personal information will not be disclosed by the parishes to recipients outside Australia unless we reasonably believe that:

- a) the information will remain subject to principles for fair handling of the information which are substantially similar to Australian privacy principles;
- b) there are mechanisms that you can access to take action to enforce such principles; and
- c) the information will not be collected, held, used or disclosed by the recipients of the information in a manner inconsistent with the Archdiocese's privacy policy.

The only exception to the above is where the parishes are disclosing information about you to an overseas parish for the purpose of recording sacraments received, which parish is not required to comply with Australian Privacy Principles.

In some circumstances, the law may permit or require us to use or disclose personal information for other purposes (for instance where you would reasonably expect us to and the purpose is related to the purpose of collection).

Except as otherwise permitted by law, we only disclose your sensitive information with your consent, for the purposes for which it was collected, and to the parties described above.

## **Security**

The parishes store your personal information in different ways, including in paper and in electronic form. The security of your personal information is important to the parishes and the parishes take all reasonable measures to ensure that your personal information is stored safely to protect it from misuse, loss, interference, unauthorised access, modification or disclosure, including electronic and physical security measures.

The parishes store your personal information in servers located in Australia.

## **Access and correction**

You may access the personal information we hold about you, by making a written request. The parishes will respond to your request within a reasonable period. We may charge you a reasonable fee for providing access to your personal information (but not for making a request for access).

The parishes may decline a request for access to personal information in circumstances prescribed by the Privacy Act, and if we do, we will provide you with a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).

If, upon receiving access to your personal information or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify the parishes immediately. The parishes will take reasonable steps to correct the information so that it is accurate, complete and up to date.

If the parishes refuse to correct your personal information, the parishes will provide you with a written notice that sets out the reasons for their refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint.

## **Notifiable data breaches**

If you believe that a data breach has occurred in relation to your personal details, please contact the Archdiocesan Privacy Officer providing details and circumstances of the data breach.

The advised breach will be investigated immediately and you will be informed of remedial action to be undertaken. If the breach constitutes a Notifiable Data Breach under the Privacy Act, the Office of the Australian Information Commissioner (OAIC) will be informed as soon as practicable of the breach and provided with the full circumstances and remedial action undertaken by the parishes of the Archdiocese.

## **Complaints and feedback**

If you wish to make a complaint about a breach of the Privacy Act or Australian Privacy Principles that applies to the parishes, please contact the parishes as set out below and the parishes will take reasonable steps to investigate the complaint and respond to you. If you are not happy with the parishes response, you may complain directly to the OAIC.

If the parishes ascertain that your enquiry or complaint concerns a Catholic Church entity that is not part of the Archdiocese of Brisbane, the Archdiocese will direct you to the appropriate contact.

If you have any queries or concerns about our privacy policy or the way we handle your personal information, please contact our Privacy Officer at:

Address: GPO Box 282, Brisbane, Queensland, 4001  
Email address: [privacyofficer@bne.catholic.net.au](mailto:privacyofficer@bne.catholic.net.au)  
Telephone: +61 7 3324 3579

### **More information**

For more information about privacy in general, you can visit the OAIC's website at [www.oaic.gov.au](http://www.oaic.gov.au).