



**PROJECT ROZANA**  
פרויקט רוזנה    مشروع روزانا

# PRIVACY POLICY

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<b>PERSON RESPONSIBLE</b>	<b>Executive Director</b>
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## POLICY AMENDMENTS

This is a working document and subject to amendment. This Policy will be available in English, Hebrew and Arabic.

Any suggestions about this Policy should be directed to the Project Rozana Development Director or Executive Director so changes can be considered. When suggestions are raised, the matter will be raised with the Executive Management Committee (EMC) for consideration. Any amendments or changes to the Policy will be submitted to the Board for endorsement.

The Development Director and Executive Director are responsible for maintaining this document; including updating confirmed changes, informing staff of the changes, and disseminating the latest version across the organisation.

Any changes or amendments involve the following steps:

- Updating the Document Version table on the first page;
- Updating the relevant provision in this manual;
- Replacing the updated version of the manual eg. shared drives, Intranet;
- Printing a hard copy of the updated manual for the office;
- Communicating the changes to all staff; and
- Archiving the old version of manual.

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## 1. PREAMBLE

This policy was written by Project Rozana in Australia. It may be used as a template across all Project Rozana offices. Project Rozana operates five offices registered in each of Australia, USA, Canada, UK and Israel, which are part of the Project Rozana Global Alliance. In this policy, 'Chair' means Chair of Project Rozana International. Unless specified otherwise the 'Board' refers to the board of Project Rozana Australia.

## 2. INTRODUCTION

This Policy covers Project Rozana Australia. This policy applies to all board members, employees, volunteers, supporters and partners in Australia.

Project Rozana is committed to using your information responsibly. We want to ensure that we're as transparent as possible in informing all our supporters about how we capture data, store it, and most importantly, use it.

We are bound by the Australian Privacy Act 1988 (Cth) (the "Privacy Act"), the Payment Card Industry Data Security Standard and the Australian Council for International Development (ACFID) Code of Conduct.

## 3. PURPOSE

The purpose of this policy is as follows:

- a) To protect the confidentiality of all people who support Project Rozana and to inform them about the limits that apply to our confidentiality;
- b) To provide guidance to staff, visitors, volunteers, supporters, partners and donors about what they can expect from Project Rozana in handling their personal information;
- c) To provide avenues by which supporters and donors can control the information we hold on them and exercise their right to privacy.

## 4. DEFINITIONS

- **Personal information** - Information or an opinion about an identified individual, or an individual who is reasonably identifiable:
  - a. whether the information is true or not; and
  - b. whether the information or opinion is recorded in a material form or not.
- **Confidentiality** - The principle whereby personal information is kept secret and not disclosed to other parties without consent.
- **Privacy** - The right to control access to oneself, and information about oneself.

## 5. REFERENCES / OTHER POLICIES

This policy must be read and understood in conjunction with the following other Project Rozana policies:

- Child Protection Policy and Code of Conduct - for confidentiality relating to children
- Project Rozana HR manual – for confidentiality relating to employment matters and staff.

The following principles and standards also guide Project Rozana's collection and use of your information:

- [The Australian Privacy Principles](#):
- [The payment card industry data security standard](#):

## 6. COLLECTION OF PERSONAL INFORMATION

### 6.1 What personal information do we collect and why?

We collect personal information to assist in engaging with you. In this way we can interact with you and respond to any questions you might have. It also allows us to keep you up-to-date on developments in our programs.

At the first point of contact we will ask you to provide the following information.

- a) Contact Information (First, Last name, Address, Contact number, Email Address)
- b) Optional Personal Details (, Date of Birth)

If you choose to make a donation, we will ask for your Credit Card Details (number, name, expiry and CVC code), direct debit card, or bank details

We ask these questions to ensure we have accurate and up-to-date personal information. We collect this information in order to:

- a) Process your donations and issue tax deductible receipts;
- b) Correctly locate your account in our database and maintain accurate details;
- c) Improve and personalise our direct and digital communications to you.
- d) Seek your continued support via mail, text or email;
- e) Keep you informed of our work, through newsletters and annual reports or update you on programs you have supported;
- f) Invite you to events or webinars;
- g) Release surveys to improve our services;
- h) Analyse donor activity in order to improve quality assurance; and
- i) Respond to your questions, comments, or feedback.

If your personal information is used for a reason other than stated above, we will contact you for your permission.

We may also collect and hold sensitive information of our staff, Board members and volunteers or prospective staff and volunteers, including completed police checks.

## **6.2 Anonymity**

Individuals may request to deal with Project Rozana anonymously or through a pseudonym. Project Rozana will accommodate your request if it is lawful, possible and practical to do so.

## **7. HOW WE MANAGE YOUR PERSONAL INFORMATION**

The protection of your privacy and personal information is of the utmost importance to Project Rozana. We will take every step to ensure it remains confidential and protected. Your personal information is stored securely, and all payments are processed using a secure PCI compliant payment gateway (see 7.1). We have secured our in-house IT system with a firewall and anti-virus scanners. We also ensure that all personal information is removed from computers before disposal or sale. Hard copy files are kept in secure cabinets and staff are trained in our privacy procedures. Donations are processed only by authorised staff. Only authorised staff have access to your information and only when it is required.

### **7.1 Payment Card Industry Data Security Standard**

This standard sets out how we might process card information and handle PCI compliance.

When donors make an online donation via our website it is important to note that this donation is processed by Stripe, our secure card payment gateway system. Project Rozana Australia and its site, does not store or have access to this credit card data. It is held by Stripe in strict compliance with the Payment Card Industry Data Security Standards (PCI DSS) which regulates the processing, transmitting or storage of credit card data. Stripe has been audited by an independent PCI Qualified Security Assessor (QSA) and is certified as a PCI Level 1 Service Provider. This is the most stringent level of certification available in the payments industry.

## **8. WEBSITE AND SOCIAL MEDIA**

In order to understand how people arrive at the Project Rozana website and related social media platforms and how they use it, we rely on cookies provided by third parties. This enables us to assess the effectiveness of our online advertisements. We may also use your browsing history on the Project Rozana website to send related messages on our work and appeals.

Cookies do not reveal personal information. You can adjust your browser to disable cookies, but this may restrict your ability to access certain areas of our website. You can also engage with us through social media, including Facebook and Instagram. You can control how you receive content through the setting on each social media site.

## 8.1 Opting Out

If you wish to opt out of communications from Project Rozana, use any of the clear links that we provide in all our digital communication (like SMS or email) or email [info@projectrozana.org](mailto:info@projectrozana.org).

## 9. DISCLOSING YOUR INFORMATION

We will only use and disclose your personal information in accordance with the Privacy Act and the Australian Privacy Principles. This may include:

- a) To our contractors who perform tasks directly on our behalf (for example mail houses). We require them to sign strict privacy and security agreements and they are also bound by the Australian Privacy Principles. These agreements make sure these contractors keep your private details confidential and do not use it for any purpose other than the work we have contracted them to perform (for example, printing and mailing an appeal letter to you).
- b) To reputable cloud-based organisations with robust security protocols in order to store your data securely. The secure storage facilities/data centres are often located overseas. To that extent:
- c) Where use or disclosure is required by law.
- d) Where we have your consent to the use or disclosure, or for the purpose for which it was collected.
- e) In order to establish, exercise or defend our legal rights (including providing information to others only to the extent required for the provision of fraud prevention, managing cases of suspected or substantiated fraud and as otherwise required).
- f) To any person who we reasonably believe may apply to a court or other authority for disclosure of that personal information, where, in our reasonable opinion, such court or authority would reasonably be likely to order disclosure of that personal information.

We do not pass on your information to any third parties other than those stated in this policy or publish them in our website or in any publication without explicit supporter submission. We do not buy or sell personal information from or to third parties.

## 10. SHARING INFORMATION PUBLICLY

Project Rozana may be required to report on its activities to implementing partners, government and funding agencies. Such reporting will be in aggregate form, ensuring that no identifiable/potentially identifiable information pertaining to the recipients of our programs is used in such reporting without their prior consent. Where case studies are used in reporting and promotion, the client will be de-identified unless we have their full consent to do otherwise.

No identifiable beneficiary information will be used in any way that is not directly related to the provision of services to that particular person or their family members.

## **10.1 Staff Obligations in Relation to Confidentiality**

Staff will not use any confidential information which they have acquired in relation to the activities of Project Rozana for their own interests or the interests or purposes of others not associated with Project Rozana. Staff will not make copies of any confidential information for any reason other than those essential to and directly related to their position and responsibilities with Project Rozana.

Staff, upon request, and in any event upon ending their engagement or employment with Project Rozana will return materials containing confidential information which are in their possession and will not use any information after leaving Project Rozana.

Any breaches of confidentiality or privacy must be reported to the Executive Director of Project Rozana Australia and appropriate action taken.

For further information on privacy and confidentiality relating to employment matters, refer to the Human Resources Manual.

## **11. THIRD PARTY WEBSITES**

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **12. ACCESSIBILITY OF INFORMATION**

Information held about an individual is accessible (at no charge) to that individual on request and reasonable steps are taken to ensure the information is accurate and up to date.

Access to information may be denied if Project Rozana has reason to believe that the request is not for a genuine purpose. If a request for information is considered not for a genuine purpose, the matter will be raised with the Executive Director for consideration of the request. A request for access to information may be made using the contact details below.

## **13. UPDATING INFORMATION**

Please let us know if the personal information we hold about you needs to be corrected, updated or completed.

Project Rozana makes every effort to ensure that the information we hold about you is correct and up to date. We may at times contact you to ensure this is the case.

## **14. ENQUIRIES AND COMPLAINTS**

Enquiries or complaints regarding privacy matters can be made in writing or over the phone using the details provided below under 'Contact Information. Project Rozana are dedicated to respond to all enquiries as quickly as possible. If you would prefer to deal



with us anonymously, you are not required to provide your personal information to us unless we are required by law to deal with individuals who have identified themselves or it is impractical for us to deal with individuals who have not identified themselves.

If you are not satisfied with how we have handled your matter, you may wish to contact the Office of the Australian Information Commissioner via the contact details listed on [www.oaic.gov.au/aboutus/contact-us-page](http://www.oaic.gov.au/aboutus/contact-us-page).

## 15. CONTACT INFORMATION

In Australia - if you have a privacy concerns, contact our team on [info@projectrozana.org](mailto:info@projectrozana.org) or by calling +61 3 9272 5600. You can also contact us by post at the address:

Project Rozana, PO Box 2400, Caulfield Junction, VIC 3161 Australia.

## 16. DOCUMENT CONTROL INFORMATION

Date	Version	Revised Description	Reviewed/ Updated by
27/4/2021	V1	Created	Board of Directors
27/05/2021	V2	Amended Anonymity provision on page 6. Amended Management of Personal Information provisions on page 6.	Executive Director