



POLICY: Privacy

Policy Group(s):	General		
Related Policy:	International Network of Churches Privacy Policy		
Commencement Date:	21/12/2001	Review Date:	19/09/2022

POLICY STATEMENT

Intent:

To provide a Privacy Policy which complies with the Act and serves faithfully the members of Citipointe Church (hereafter referred to as Citipointe). This Privacy Policy expresses how Citipointe collects, uses, discloses and stores personal information. Citipointe supports responsible and transparent handling of personal information and respects an individual's right to know how his or her personal information will be collected, used, disclosed, stored and disposed of.

Scope:

Inclusions: All Citipointe Committee of Management members (may be referred to as COM) employees, contractors, students/interns, church members and visitors (hereafter referred to as personnel)

Restrictions: The Citipointe Privacy Policy is a second generation Privacy Policy which relates specifically to the members and potential members of Citipointe. The Policy is set within the framework and scope of the Whole of Church Privacy Policy of Christian Outreach Centre trading as the International Network of Churches Movement (hereafter referred to as INC).

Exclusions: Nil

Objectives:

1. To provide a policy which complies with the Act.
2. To provide a policy which serves the members and potential members of Citipointe.

3. To provide guidelines for the personal data collection of members and potential members of Citipointe for personnel.
4. To Identify the scope of information collected.
5. To provide a framework for data security and confidentiality.
6. To provide members and potential members with an avenue to review personal information held by Citipointe about them.
7. To provide adequate privacy protection as a necessary condition for Citipointe to participate in e-communications and etransactions.

Policy Provisions:

1. Citipointe's Privacy Policy abides within the Whole of Church Privacy Policy of the International Network of Churches. This Citipointe privacy policy, hence is a second generation Privacy Policy which resides under the INC movement's overarching Privacy Policy. The INC Movement's Privacy Policy may be viewed at <https://www.inc.org.au/index.php/privacy-policy/>
2. **Policy Statement**
 - 2.1. Citipointe Church ABN 79 400 419 737 099 appreciates that privacy is very important. Citipointe in compliance with the Privacy Act (2000) has adopted this Privacy Policy. We recognise the right of people to keep their personal information private.
 - 2.2. Citipointe's Privacy Policy covers the churches and related entities treatment of personally identifiable information that we collect or hold. Like many other organisations, Citipointe, as a part of the International Network of Churches Movement, must comply with the Australian Privacy Principles contained in the Information Privacy Act 2009 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012 when dealing with personal information.
 - 2.3. All personal information collected by Citipointe will comply with the Australian Privacy Principles as detailed below and as amended from time to time.
 - 2.3.1. Collection
 - 2.3.2. Use and disclosure
 - 2.3.3. Data quality
 - 2.3.4. Data security
 - 2.3.5. Openness

- 2.3.6. Access and correction
- 2.3.7. Identifiers
- 2.3.8. Anonymity
- 2.3.9. Transborder data flows
- 2.3.10. Information

3. Information We Collect

3.1. General

Citipointe will collect general information about you, such as your name, address, contact details, and special dates such as birthdays and anniversaries. We may also collect other types of personal information including which small group in the church you belong to, details of pastoral contacts, significant events such as dates of salvation, water baptism, course completions etc. Other data may also be collected for example when you wish to obtain goods or services from Citipointe, when you register for conferences or events, and when you participate in Church activities or complete other forms.

3.2 Video/Photographs

Images of individuals in photographs or film are treated as personal information under the Privacy Act where the person's identity is clear or can reasonably be worked out from that image. Citipointe upholds that all photographs and video footage of individuals will be used solely for church related purposes including at times promotion.

Both video and still photography are an active part of the church life, activities and services. Citipointe uses video and still photography for church related purposes or promotions. In accordance with the privacy act an individual's consent will be sought if the photograph or video records sensitive information about the individual. Where practically possible Citipointe will seek the consent of individuals in other cases.

If you would like to have a video or still image removed from any material, please contact us using the contact details set out below.

3.3 Sensitive Information

Certain information which may be collected by Citipointe will be regarded as Sensitive Information in accordance with Government regulations. The disclosure of Sensitive Information can only be made by Citipointe with your direct consent. Some examples of Sensitive Information which in special circumstances may be collected include:

- 3.3.1 Criminal record;

- 3.3.2 Racial or ethnic origin;
- 3.3.3 Health;
- 3.3.4 Philosophical beliefs;
- 3.3.5 Financial circumstances;
- 3.3.6 Pastoral Care Matters

Where practicable, the purpose for which we collect personal information will be made clear at the time of collection.

In certain situations we may be unable to provide you with access to some of our services or the assistance you have requested if you do not provide us with certain information. However, in such cases all available avenues will be exhausted in order to accommodate your needs prior to such a denial.

Users can generally visit Citipointe website without revealing who they are or other personal information unless they log on, place an order, or register with us. Citipointe will not collect any personal information about visitors to the website except when they knowingly provide it.

Internet “Cookies”

"Cookies" are small pieces of information that are stored by your browser on your computer's hard drive. Citipointe cookies do not contain any personally identifying information, but they may be used to personalise your Citipointe (www.citipointechurch.com.au) or INC (www.inc.org.au) web page for your use.

4. How we use your information

Citipointe will use the personal information we collect for the purpose disclosed at the time of collection, or otherwise as set out in this Privacy Policy. We will not use your personal information for any other purpose without first seeking your consent, unless authorised or required by law. Generally we will only use and disclose your personal information as follows:

- 4.1. to provide adequate pastoral care as a member or pre-member of Citipointe;
- 4.2. to establish and maintain your involvement with Citipointe, including providing you with birthday cards, newsletters and invitations to special events;
- 4.3. to provide the products or services you have requested from Citipointe;
- 4.4. to answer your inquiry
- 4.5. to register you for events, conferences or promotions;
- 4.6. to assist us to make Citipointe's sites, services and products more valuable to our community;

- 4.7. for direct promotion of products or services and to keep you informed of new developments we believe may be of interest to you. If we contact you in this way without obtaining your prior consent, we will provide you with the opportunity to decline any further promotional communications;
- 4.8. to third parties where we have retained those third parties to assist us to operate Citipointe and provide the products or services you have requested, such as religious education instructors, catering and event coordinators, promotions companies, transport providers, health care providers, website hosts and IT consultants, and our professional advisers such as consultants, lawyers and accountants. In some circumstances we may need to disclose sensitive information about you to third parties as part of the services you have requested; and
- 4.9. to different parts of Citipointe to enable the development and promotion of other products and services and to improve our general ability to assist Church attendees and the wider community.
- 4.10. when we have reason to suspect that unlawful activity or misconduct of a serious nature that relates to our functions or activities has been, is being or may be engaged in.

5. What we will not do with your information

The information we collect is used only for the purpose we have indicated. We do not and will not:

- 5.1 Sell, trade or rent personal information about you to any other party outside Citipointe or the Christian Outreach Centre Movement.
- 5.2 Record credit card information or other personal information you may from time to time supply us with for the purposes of making a one off purchase or transaction. All sensitive information such as credit card numbers will be responsibly destroyed after the transaction has been completed
- 5.3 Pass on your personal information to anyone unless we are legally bound to do so under any federal or state laws.

6. Access to your information

You can request access to the personal information that Citipointe holds about you by contacting Citipointe's Compliance Officer as set out below. We will provide you with access to your personal information unless we are legally authorised to refuse your request. We may charge a reasonable amount for providing access.

If you wish to change personal information that is out of date or inaccurate at any time please contact us. After notice from you, we will take all reasonable steps to correct any of your information which is inaccurate, incomplete or out of date. If

you wish to have your personal information deleted please let us know and we will delete that information wherever practicable.

We may, only under exceptional circumstances, refuse your request to access, amend or delete your personal information. If such a request is refused, we will provide you with a reason for our decision and, in the case of amendment, we will note with your personal information that you have disputed its accuracy.

7. Security

Citipointe will take reasonable steps to keep secure any personal information which we hold and to keep this information accurate and up to date. Personal information is stored in a secure server or secure files. We use data hosting facilities and third party service providers to assist us with providing our services. As a result, your personal information may be transferred to, and stored at, a destination outside Australia, including but not limited to New Zealand, Canada, Cambodia, United States of America and the United Kingdom.

Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our partners. We take such steps as are necessary in the circumstances to ensure that any overseas third party service providers we engage do not breach the Australian Privacy Principles.

The Internet is not a secure method of transmitting information. Accordingly, Citipointe cannot accept responsibility for the security of information you send to or receive from us over the Internet or for any unauthorised access or use of that information.

8. Changes to this Privacy Policy

Citipointe may amend this Privacy Policy from time to time and provide access to such amended versions at the information counters at Citipointe or on our website at www.citipointechurch.com. We suggest that you visit our website regularly to keep up to date with any changes.

9. Contacting us

If you would like any further information, or have any queries, problems or complaints relating to Citipointe's Privacy Policy or our information handling practices in general or if at any time you believe that Citipointe has wrongfully disclosed your Personal Information or has breached this Privacy Policy, then you may contact or lodge a complaint with Citipointe, via the following avenues:

Addressing your enquiry or complaint to the Compliance Officer

Email mail@citipointechurch.com.au

Phone (07) 3343 8888 or

Address Citipointe Church PO Box 2111 Mansfield DC Qld 4122.

If you are not satisfied with the response you receive from Citipointe you may contact the Federal Privacy Commissioner in one of the following ways:-

By telephoning 1300 363 992; or by writing to the Director of Complaints, Office of the Federal Privacy Commissioner, GPO Box 5218, Sydney NSW 1042.

SUPPORTING PROCEDURES AND GUIDELINES

- Staff and Volunteers manual for data collection and record keeping.
- Staff and Volunteer confidentiality agreement.

POLICY SUPPORTING INFORMATION

Relevant Commonwealth/ State Legislation	Information Privacy Act 2009 (Qld) Privacy Amendment (Enhancing Privacy Protection) Act 2012
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ACCOUNTABILITIES

Implementation:	Executive Team
Compliance:	Compliance Office Executive Team
Monitoring and Evaluation:	Compliance Office Executive Team
Development/ Review:	Compliance Office Executive Team
Approval Authority:	Citipointe COM
Interpretation & Advice:	Citipointe COM Executive Team

WHO SHOULD KNOW THIS POLICY?

- All Citipointe employees, student/interns, volunteers, church members involved in data collection
- All Potential Citipointe Members

EFFECTIVENESS OF THIS POLICY

Performance

Indicators:

- Accessibility of Policy to employees and members
- Compliance with the Act
- Adherence to the Policy by employees and volunteers who record data
- User-friendly

Definitions and Acronyms:

COM - the Committee of Management of Citipointe Church
- the governing authority of the affairs of the local church which includes volunteer members.

Employees includes all paid workers at Citipointe.

INC - International Network of Churches (trading as Christian Outreach Centre)

Personal information - Personal information is information or an opinion, including information or an opinion forming part of a database, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Students/Interns are Citipointe Ministry College students/interns or Citipointe Church interns in particularly those who engage in working with children for ministry training.

Volunteer includes all volunteers of Citipointe Church but particularly those who work directly with children.

APPROVAL – section maintained by the Compliance Officer

Reference No.	Approved	Date	Committee/ Board	Resolution No. / Minute Ref.
PP20111115				

REVISION HISTORY – section maintained by the Compliance Officer

Reference No.	Approved / Rescinded	Date	Committee/ Board	Resolution No. / Minute Ref.
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1111	Approved	15/11/2011	Citipointe COM	12.
1013	Approved	29/10/2013	Citipointe COM	15.
0414	Approved	22/04/2014	Citipointe COM	22/04/2014 Paragraph 2, 6,9
0814	Approved	26/08/2014	Citipointe COM	16.2
1015	Approved	27/10/2015	Citipointe COM	16
0406	Approved	16/04/2006	Citipointe COM	26/10/2006 Paragraph 6
0917	Approved	19/09/2017	Citipointe COM	4.9