



1. Title of Policy

MITGF Privacy Policy

2. Introduction

MIT Group Foundation Ltd (MITGF) is a not-for-profit, non-governmental organisation and a registered Australian Charity with the Australian Charities and Not-for-profits Commission (ACNC). MITGF undertakes activities that fall within the scope of its objects including relief and development activities in developing countries.

3. Purpose of the Policy

MITGF is committed to conducting its activities at all times in a manner that is ethical, lawful, honest and proper, and guided by the principles of accountability and transparency.

The purpose of this policy is describe how MITGF collects, uses, discloses and otherwise handles “personal information” of its stakeholders – including beneficiaries, supporters, donors, personnel and partner organisations it works with (“you”). It also details how you may access personal information held by MITGF about you and how you can lodge a complaint if you believe the privacy of your personal information has been breached.

MITGF is committed to respecting and protecting the privacy of the personal information which you share with us.

4. Definitions

Personal information: is information which directly or indirectly identifies a person.

Partner Organisation: any organisation or person that MITGF works with, or is involved with, in connection with any relief or development programs or projects.

Personnel: Personnel are employed by an organisation, whether full-time, part-time, casual, or on a voluntary basis.

5. Australian Privacy Principles

MITGF is committed to the proper collection, use and storage of personal information in accordance with the *Australian Privacy Principles* (APPs) in Schedule 1 of the *Privacy Act 1988*

(Cth). The APPs provide standards, rights and obligations in respect of how personal information is handled from collection, to use, disclosure, storage and access.

6. Collection of Information

What kind of information does MITGF collect and why?

MITGF collects personal information for the primary purpose associated with carrying out its relief and development activities. This includes, but is not limited to:

- processing a donation, sponsorship or financial support;
- selection, recruitment and administration and management of personnel;
- participation in MITGF programs;
- conducting research, surveys, reviews and feedback;
- communicating with Partner Organisation to deliver our programs and projects;
- communicating with our supporters and donors;
- compliance with any reporting requirements and administration of applicable laws and regulations;
- to support marketing, fundraising or the promotion of MITGF; and
- where relevant, to carry out checks for recruitment and assessment of potential personnel

The personal information typically includes (but is not limited to): your name, age, gender, place of birth, nationality, and contact details. It may also include, where applicable, your financial information and sensitive information such as your health information.

How MITGF collects information

MITGF collects information by lawful and fair means, which are not unreasonably intrusive. We collect information that is reasonably necessary to perform its functions and activities or to comply with the law.

MITGF generally collects information about you directly from you (eg. forms filled out by you, both paper and on-line or from meetings and interviews with you or over the phone, by email or through our website). There may also be times when MITGF is provided with your personal information from a third party, such as through a Partner Organisation.

MITGF will ensure that the collection of personal information, images and stories does not harm people or the environment

7. Use and disclosure of information

MITGF will only use or disclose personal information for the primary purpose for which it was collected, for any related secondary purpose that you would reasonably expect, or with your consent, or as permitted or required by law or as authorised by the APPs. MITGF may use or disclose personal information (other than sensitive information) for the purpose of MITGF direct marketing, but must only do so in accordance with the APPs.

MIT may disclose personal information to third parties for the purposes set out in this Policy, such as to a Partner Organisation for the purpose of delivering our programs or projects.

MIT may also use and disclose information where required or authorized by law (meaning any Commonwealth, State or Territory law) or in accordance with the APPs, for example, to prevent serious and imminent threat to life, health or safety.

8. Storage and data quality

MITGF holds personal information which may be stored in electronic and/or hardcopy form. MITGF takes reasonable precautions to ensure that information is stored securely, is accurate and protected from misuse, loss, unauthorized access, modification or disclosure. MITGF personnel are bound by confidentiality on the use of personal information and are required to respect the privacy of individuals and MITGF has in place ways to protect personal information including controlling access to MITGF premises, security access to MITGFs computer networks and other security technology.

MITGF takes reasonable steps to confirm the accuracy of information it holds about you. From time to time, if relevant, MITGF may ask for updated information.

Where information is no longer needed and no longer required to be retained under legislation, MITGF either destroys records containing personal information by reasonably secure means or de-identifies the personal information.

9. Access

You may request access to information that MITGF holds about you by lodging a written request with MITGF. The request must be made by you personally or by another person that you have authorised to make the request on your behalf. Any request for access to personal information will be dealt within a reasonable period after the request is made. In some circumstances MITGF may refuse you access, such as:

- providing access would have an unreasonable impact on the privacy of other individuals; or

- providing access would be likely to prejudice an investigation of possible unlawful activity; or
- the request for access is frivolous or vexatious

In this case, you will be notified of the reason MITGF is refusing access.

10. Enquiries and privacy complaints

Questions or concerns about the privacy of information we hold about you, and requests for access to and correction of personal information, and if you wish to make a complaint about a possible breach of privacy, may be directed to MITGF by:

Post: Level 6, 284-294 La Trobe Street, Melbourne 3000
Email: shesh.ghale@mit.edu.au
Tel: +61 3 8600 6762

Complaints may also be directed to the Office of the Australian Information Commissioner (<http://www.oaic.gov.au>) if you think that MITGF has interfered with your privacy.

If you believe MITGF has breached the Australian Council for International Development (ACFID) Code of Conduct, you can make a complaint to the ACFID Code of Conduct Committee at:

- Email: Chair, ACFID Code of Conduct Committee at code@acfid.asn.au
- Post: Chair, ACFID Code of Conduct Committee c/- ACFID, Private Bag 3, Deakin ACT 2600

Acknowledgements:

- *MIT Privacy Policy*
- *Privacy Policy, Institute of Community Directors*