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## Holy Trinity Limited - Privacy Policy

Holy Trinity Limited ACN 147 861 023 ('we', 'our', 'us', 'HTL') is committed to protecting the personal information that we collect and hold about you. This Privacy Policy (**Policy**) sets out how we collect, use, store and share your personal information and how to contact us with any queries or concerns. Although we are not bound by the *Privacy Act 1988* (Cth) (**Privacy Act**), we adhere to the Australian Privacy Principles (**APPs**) as far as practicable.

By voluntarily supplying us with your personal information you are agreeing to be bound by this Policy. We may update our Policy from time to time. You may obtain a copy of the current Policy by sending an email to our Privacy Officer at [privacy@trinity.network](mailto:privacy@trinity.network) and requesting a copy. We may also contact you via your contact information on file, for example by email, notification or some other equivalent measure.

If you have any queries, concerns or complaints about how we handle your personal information, please contact our Privacy Officer in the first instance:

Privacy Officer Contact: Andrew Severin  
Email: [privacy@trinity.network](mailto:privacy@trinity.network)

Postal address:  
Attention: Privacy Officer  
88 North Terrace  
Adelaide SA 5000

### 1. What types of information do we collect and why?

In the course of our ministry activities, we collect personal and other information about our members and how they interact with us. We collect personal information through a number of mechanisms, including:

**1.1 Collection from you:** we collect and store information you provide directly to us (either in person, by email, by phone, or by any other direct means) or which is transferred to us from another entity within the Trinity Network in order to continue our ministry activities. This includes, but is not limited to:

- Contact information: such as your name, address, email address, telephone number
- Personal information: such as your date of birth
- Financial information: such as your payment information (credit card, bank account)
- Working with Children Check number
- Emergency contact details

**1.2 Automatic:** we use cookies (small text files stored on your devices that provide us with information such as your internet protocol (**IP**) address, server information, internet service provider, and information on how you interact with our website) and other services that allow us to understand how you use our online media. This information is not linked to you personally.

We use Google Analytics which tracks and measures user interaction and provides data to help improve our ministry activities. This service does not provide us with personal information.

If you opt-out of third-party tracking technologies or elect to prevent the use of cookies, this may result in the loss of website functionality, restrict your use of the website or delay or affect the way in which the website operates.

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**1.3 Device:** if you interact with us through a mobile device, we receive technical information about your device, including numbers that identify the device and your location information. The information about the device and location are not associated with you and cannot be used to identify you.

**1.4 Communications:** when you communicate with us, we collect information such as your contact details (such as email address or phone number). We also engage third party services that provide us with information about how you interact with some communications we distribute. You can elect to not receive communications from us by contacting our Privacy Officer.

**1.5 Digital platforms:** if you connect with us via a social media login (such as Facebook or Google), we collect information derived, associated or connected with that platform where permitted by the platform's terms of service. Any information we collect from social media, or other online platforms is collected in accordance with that platform's terms and conditions.

**1.6 Through other sources:** where necessary, we also collect your information from publicly available records. We may do this where it is unreasonable or impractical to collect this information from you.

If you have previously applied for employment with us we may have received your personal information from third parties such as recruiters or external websites. We use the information we receive to contact you about any potential opportunities or to evaluate your candidacy.

## **1.7 Sensitive information**

We may collect information considered to be *sensitive information* in the Privacy Act, including:

- Racial or ethnic origin
- Religious beliefs or affiliations
- Philosophical beliefs
- Sexual preferences or practices

We will only collect this information directly from you or where we have consent to collect the information from a third party.

In some circumstances, you have the option of not identifying yourself or interacting with us using a pseudonym. However, this may not be practicable or possible when engaging with us.

## **2. How do we use your information?**

We will only use your information for the purposes for which it was collected (**primary purpose**) or a purpose related to that primary purpose if it would be reasonably expected by you or where we have separately obtained your consent.

We use personal information for the primary purpose of continuing our ministry activities, consistent with our principles.

If you would like to restrict how your personal information is handled beyond what is outlined in this Policy, please contact our Privacy Officer.

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## **2.1 Related party and group transfers**

We are part of a larger group of entities that together form the Trinity Network. As such, we are provided with and we ourselves may provide your information to other entities within the Trinity Network. All information transfers are subject to the security information obtained in paragraph 3 below.

## **2.2 Disclosure of personal information to third parties**

We may disclose your information to third parties who assist us in providing, managing and administering our ministry activities. We will also disclose your personal information where such disclosure is required by law.

We disclose your personal information to third parties that:

- Manage our church database
- Process information
- Other purposes related to the above

For our church database, we use a cloud-based church management software provided by PushPay known as Church Community Builder (**CCB**) to manage and store your personal information ([PushPay Privacy Policy](#)).

We do not sell or license your information to third parties.

## **2.3 Disclosure of credit information to third parties**

We do not collect or disclose credit information to any credit reporting bodies.

## **3. How do we store and secure the information we collect?**

We collect, store and process your personal information as physical files in a secured filing cabinet and/or electronically on our electronic data base systems and on computers with appropriate back up and security systems.

### **3.1 Security and management of personal information**

We will take reasonable steps to protect the personal information we hold from misuse, loss, and unauthorised and accidental access, modification, disclosure, destruction, or other action which prevents or otherwise hinders our access to your personal information on a temporary or permanent basis. We do this by:

- Putting in place physical, electronic and procedural safeguards in line with industry standards
- Requiring any third-party providers to have acceptable security measures to keep personal information secure
- Limiting access to the information we collect about you
- Imposing confidentiality requirements on our employees
- Only providing access to personal information once proper identification has been given

We protect your personal detail stored on a digital database (CCB) through encryption, firewalls, secure buildings and computer security systems. PushPay secures data with up to date technology on its servers and has strong password protection on its servers and for users. For more information about the CCB security specifications, please refer to the [PushPay website](#).

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While we take all steps reasonable in the circumstances to protect your information, in the unlikely event a data breach occurs, we will notify you and any relevant authorities.

We will only keep your personal information for as long as we require it for the purpose for which it was collected. If we no longer require your personal information, and are not legally required to retain it, we will take reasonable steps to destroy or de-identify the personal information.

### **3.2 Disclosing and storing information overseas**

If your personal information is managed on CCB, this information is stored overseas. We take all steps reasonable in the circumstances to ensure that your personal information is protected and securely stored. We retain possession and control of your personal information and have contractual arrangements that control how PushPay uses and handles your personal information. Please also refer to the paragraph above regarding the security specifications employed by PushPay.

We do not otherwise disclose personal information overseas.

## **4. How to access and control your information?**

### **4.1 Accessing the information we hold about you**

Under the APPs you may be able to obtain a copy of the personal information that we hold about you. To make a request to access this information please contact us in writing. We will require you to verify your identity and specify what information you wish to access. If eligible, we will grant you access to the information within 30 days.

We may charge a fee to cover the costs of verifying your application, and retrieving, reviewing and copying any material requested.

### **4.2 Updating your personal information**

We endeavour to ensure that the personal information we hold about you is accurate, complete and up to date. Please contact us at the details above if you believe that the information we hold about you requires correction or is out of date. We endeavour to process any request within 30 days and will provide written reasons if your request is rejected, as well as providing details for making a complaint about the refusal if necessary.

For corrections to credit information we will provide, where practicable, written notice of the correction to any entity we have disclosed this information to previously.

## **5. Complaints**

If you are concerned that we have not complied with your legal rights or the applicable privacy laws, contact our Privacy Officer in the first instance. Please contact our Privacy Officer (contact details above) with a thorough description of your concerns and a response will be provided within a reasonable period. All complaints must be in writing.

When processing a complaint, we will require you to provide us with information to confirm your identity before processing a request related to information we may hold about you.

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We expect our procedures will deal with your complaint fairly and promptly. However, if you remain dissatisfied, you can also contact the Office of the Australian Information Commissioner as follows: Director of Compliance Office of the Australian Information Commissioner

Director of Compliance Office of the  
Australian Information Commissioner  
GPO Box 5288  
Sydney NSW 2001

For more information on privacy see the [Australian Information Commissioner's website](#).

You may also have a right to contact the relevant supervisory authority in your jurisdiction. If you are unsure about who the relevant supervisory authority may be, please contact our Privacy Officer.