

Glebe Administration Board Privacy Policy

Introduction

The Glebe Administration Board (“GAB”, “we” or “us”) manages and controls the Diocesan Endowment (“DE”), being the property held on the trusts set out in the *Diocesan Endowment Trust Ordinance 2016*.

GAB is the trustee of the Diocesan Cash Investment Fund (“DCIF”) through which it accepts loans on a non-recourse basis from affiliates, being –

- (a) organisations constituted by or under the authority of the Synod or the Standing Committee of the Synod of the Diocese of Sydney, and
- (b) organisations in relation to which the Synod or the Standing Committee of the Synod is empowered to make ordinances or other binding rules, and
- (c) a person or persons acting as trustee of church trust property.

GAB is also the trustee of the Long Term Pooling Fund (“LTPF”) through which it pools church trust property for long term investment in a manner aligned to the ethical investment policy of the Diocese of Sydney. The entities that may invest in the LTPF (“unitholders”) include:

- (a) the Anglican Church Property Trust Diocese of Sydney which holds church trust property for certain parishes, diocesan organisations or other purposes of the Diocese; and
- (b) other entities of the Diocese holding church trust properties.

In acting as trustee of the DCIF and the LTPF, GAB may collect and hold certain personal information regarding persons acting on behalf of affiliates and unitholders.

Purpose

This Privacy Policy summarises how we will deal with your personal information.

Commitment

We are committed to protecting your personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles.

By visiting our pages on the website of the Sydney Diocesan Services, using any of our services or otherwise providing us with your personal information (or authorising it to be provided to us by someone else), you agree to your personal information being handled as set out in this Privacy Policy.

Definitions

For the purposes of this policy –

Personal Information is information or an opinion about an identified individual or an individual who is reasonably identifiable.

Sensitive Information includes information about your health, your race or ethnic origin, political opinions and religious beliefs.

Personal Information

GAB collects and holds personal information about a range of people, including –

- ♦ Account holders and signatories of DCIF and LTPF
- ♦ Beneficial owners of funds that are held in DCIF and LTPF

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- ♦ Members (and prospective members) of boards, councils or committees of the Anglican Church Diocese of Sydney
- ♦ Trustees of church trust property
- ♦ Officeholders of Anglican churches and parishes

GAB may collect a wide range of personal information such as –

- ♦ Your name, date of birth and evidence of identity
- ♦ Contact details such as address, phone number and email
- ♦ Your tax file number
- ♦ Passwords, passcodes and secret questions to confirm your authorisation of a transaction
- ♦ Credit and debits to your accounts
- ♦ Information about your financial position
- ♦ Your current credit history

We only collect this information where it is reasonably necessary for the provision of our services, or for arranging others to provide you with a service, or if required by law.

Sensitive Information

Some personal information that we collect may also be sensitive information. The most common form of sensitive information we collect is in relation to religious beliefs. This is likely to be incidental. For example, that you are acting on behalf of an affiliate that is a religious organisation.

Collection and Storage

GAB may collect your personal information in various ways, including via telephone, our website (including through entry into an online database), in writing (including by email or other electronic means) and/or through online forms, whether hosted on a third party website or our own.

Sensitive Information

GAB will only collect sensitive information about you with your consent unless –

- ♦ we are otherwise allowed or required by law to collect that information, or
- ♦ the information relates to our activities and relates solely to members of the Anglican Church Diocese of Sydney or to individuals who have regular contact with us in connection with our activities.

If you provide us with sensitive information about yourself which is necessary for the provision of our services, we will treat this as collection of such information with your consent.

Third Parties

In most situations we collect your personal information directly from you. However, we may also collect information from third parties if it is impractical to collect it directly from you. For example, if you are obtaining our services on behalf of your church or parish, we may collect information from the wardens and/or rector of your church. In other cases, we may collect information from a person you have authorised to deal with us on your behalf.

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We may also seek to collect information about someone else from you (for example, if you hold one of the positions listed in a paragraph above). However, you must not provide us with personal information about another person unless you have that person's consent to do so, have told them that their personal information will be handled in accordance with this Privacy Policy and have told them where they can find a copy of this policy.

Unsolicited personal information

If we receive personal information about you that we have not requested (unsolicited personal information) we will generally, unless otherwise required or permitted by law, delete or destroy it as soon as practical after receiving it. If you provide us with unsolicited personal information about yourself we may retain this information if it is necessary for the provision of our services or to comply with our legal obligations, or we do so with your consent.

Collection of personal information required by law

In certain circumstances we may be required or permitted by law to collect certain personal information about you. For example, we may need to collect your name, residential address, country of residence, date of birth, and other types of personal information to comply with our legislative obligations.

Consequences of not providing personal information

You do not have to provide us with your personal information but if you do not provide us with the personal information that we need, we may not be able to provide services or assistance to you or continue to provide an existing service to you.

Purpose of collecting your Personal Information and its use by GAB

GAB only collects, holds and uses personal information for the following purposes –

- ♦ providing you with services that have been requested or for purposes incidental to those services;
- ♦ processing authorised payments and transactions to and from you;
- ♦ contacting you regarding matters that you have an interest in, such as those pertaining to a board, council or committee that you may be on, or concerning your church or the Anglican Church Diocese of Sydney generally; and
- ♦ any other uses identified at the time of collecting your personal information.

GAB may collect, hold and use personal information for other purposes that are permitted or required by law.

Disclosure

Any personal information provided to us may be disclosed, if we consider it appropriate, to other entities of the Anglican Church Diocese of Sydney, including –

- ♦ Archbishop's Office and Diocesan Registry (including the Professional Standards Unit);
- ♦ Anglican Church Property Trust Diocese of Sydney;
- ♦ Sydney Diocesan Services; and
- ♦ Sydney Church of England Finance and Loans Board.

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We will not disclose your personal information to an entity of the Anglican Church Diocese of Sydney for the purposes of that entity soliciting donations from you.

We may also disclose your information to government bodies, regulators, law enforcement agencies and any other parties where authorised or required by law.

GAB may disclose your personal information to third party service providers, agents or contractors from time to time to help us to provide our services. If we do this, we generally require those parties to protect your personal information in the same way we do.

We may also disclosure your information to any other entities identified at the time of collecting your personal information or which you subsequently request or expressly consent to us providing with your personal information.

Disclosure to overseas recipients

In general GAB does not disclose your personal information to any overseas recipients, although there may be some specific exceptions to this, for example if making an international transaction on your behalf. On such occasions we will seek your consent to disclose your personal information and will outline to you who it will be disclosed to and how it will be used by them.

Storage and Security

We take reasonable steps to protect any personal information that we hold from misuse, interference and loss and from unauthorised access, alteration and disclosure. For example, we implement the following security measures –

- ♦ security procedures for access to our internal office areas;
- ♦ security procedures within our offices (including, locked cabinets and file rooms for personal information that is particularly sensitive);
- ♦ Information Technology security procedures including password protection, firewalls, intrusion detection, security permissions, file audit trails, and site monitoring; and
- ♦ a requirement for all staff to maintain confidentiality except insofar as disclosure is reasonably necessary for the proper performance of employment duties (as outlined in workplace policies and/or employment contracts).

Your personal information may be stored in a third-party data centre operated by Salesforce that is located overseas. We access this data through the Internet. Salesforce's systems are subject to a number of internationally recognised privacy and security audits (see <http://trust.salesforce.com>).

Access

You may access personal information we hold about you, subject to certain legal restrictions or exemptions. Where such restrictions or exemptions exist we will advise you of those reasons at the time of your request.

If you wish to access the personal information we hold about you or request that it be corrected or updated, you should contact our Privacy Officer using the contact details below.

While we do not charge you for a request for accessing your personal information you should be aware that we may charge a reasonable fee (which will be notified to you once you make a request) for our time and expenses in the following circumstances –

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- ♦ if an extended amount of time is required to collate and prepare material for you; and
- ♦ if you wish to have your files photocopied for you.

Quality of Information and Correction

We take reasonable steps to ensure that the personal information we hold about you is accurate, complete and up-to-date. However, we also rely on you to advise us of any changes to your personal information in a timely manner.

If there are any changes to your personal information or if you believe the personal information we hold about you is not accurate, complete or up-to-date or is misleading, please contact the GAB staff member responsible for our provision of services to you, or if you are unsure who this person is, our Privacy Officer using the contact details below, so that we can update our records accordingly. In some cases we may refuse to make changes in the manner requested by you, and in such case will provide you with a written notice that explains the reasons for our refusal. In such circumstances you may provide us with a statement in respect to the need for correction and ask us to associate the statement with the information in question.

Complaint Handling

If you wish to make a complaint about a breach of this Privacy Policy or Australian Privacy Principles you can contact us using the contact details below.

You will need to provide us with sufficient details regarding your complaint together with any supporting evidence.

We will refer your complaint to our Privacy Officer who will investigate and determine the steps (if any) that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation within 30 days of the date your complaint is made or the date you provided us with any additional information.

If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner via www.oaic.gov.au.

Changes to the Privacy Policy

GAB may update this Privacy Policy from time to time so please review it periodically on the website of the Sydney Diocesan Services at www.sds.asn.au for any changes.

Your continued use of our services (including online services), requesting our assistance or the provision of further personal information to us (directly or via an authorised person) after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

Contact us

If you have a query relating to this Privacy Policy or wish to make a complaint, please contact us using the following contact details –

The Privacy Officer
Sydney Diocesan Services
PO Box Q190
QVB Post Office NSW 1230

Phone: 02 9265 1647
Email: szl@sydney.anglican.asn.au

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CHANGE HISTORY

Date	Comment
February 2015	Adoption of Policy
February 2017	Miscellaneous amendments
November 2019	Annual review – removed references to Glebe Income Accounts
November 2021	Policy reviewed, no changes made.
April 2023	Changes made to include the LTPF.