



ABN: 91 382 585 773

# **Privacy Policy**

**Information and Photo Policy**

**for Church Activities**

# Change History

Issued as Policy version 1.0 on (Draft at this stage)

Version	Date	Sections	Remarks

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# 1. Introduction

In the course of Eastgate Bible Church Inc. (Eastgate) sponsored activities (such as Services, Church camps and Bar-B-Q's etc.) there may be opportunities to collect information and/or to take photos relating to events and the people involved. This may include information and photos that include children.

The 'Privacy Act' (1988) protects Personal Information that is held, or collected for inclusion, in a 'record'. A 'record' is defined to include written and electronic forms of information, including a photograph or other pictorial representation of a person. If the individual's identity is apparent or can reasonable be ascertained, from a photo or other image, then the collection, use and disclosure of that image is covered by the Privacy Act. As with other forms of Personal Information, the use of images is limited by the scope of the Privacy Act. For example, an image is not covered by the Privacy Act if it was taken by an individual who is acting in their private capacity. That is, individuals taking pictures for their own private purposes are not covered by the Privacy Act.

Eastgate is covered/or may be covered by some parts of the Privacy Act. In particular, the use of photographs on 'Facebook' is particularly problematical because of the 'commercial' nature of the social media site. This 'commercial' nature of Facebook automatically invokes the requirement for permission to include an individual in 'Facebook' entry if their identity can 'reasonably be ascertained'.

The other area in which we are covered or may be covered by the Privacy Act is with respect to the storage of 'sensitive' information.

Therefore, to meet our legal and moral obligations and better reflect Rule 12 of our Constitution regarding use of Personal Information held, Eastgate has adopted the following Privacy Policy.

## 2. Privacy Policy in Brief

1. Under no circumstances will any person be identified on Eastgate's public facing web page or any official open to the public Eastgate social media without the express agreement of the individual being identified.
2. Without special individual agreements, the collection of personal details and photographs will be limited to the following uses:
  - a. Membership lists
  - b. Telephone directories
  - c. Church fellowship activities
  - d. Promotional, celebration or encouragement conducted wholly within the fellowship.
  - e. Pastoral care
  - f. Contacting members and adherents of Eastgate by physical or electronic means.
3. All individuals who have provided information to Eastgate have the right to inspect and request correction of any of their personal details. This access is without charge.
4. Collected Personal Information and photographs will be used internal to the fellowship made up of Eastgate members and adherents.
5. Other than where required by law to disclose details, no information will be divulged to third parties without the express permission of the individual being identified.
6. A condition of access by members or adherents to any of this collected Personal Information is that the person gaining access will agree to be bound by this policy document.
7. People will usually be advised of and have access to this policy at the time of collection of Personal Information.

### 3. Privacy Policy

**Eastgate Bible Church Inc. (Eastgate)** is committed to ministering to you and your family. This policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APP's) contained in the Privacy Act 1988 (the Privacy Act). The APP's govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.aaic.gov.au](http://www.aaic.gov.au).

#### ***What is Personal Information and why do we collect it?***

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses, phone numbers together with individual and family photos.

This Personal Information is obtained in many ways including **meetings, correspondence - by telephone, by email, via our website [www.eastgatebiblechurch.com](http://www.eastgatebiblechurch.com), from media and publications, from other publicly available sources, from cookies** and from third parties. We don't guarantee website links or policy of third parties.

Under no circumstances will any person be identified on Eastgate's public facing web page or any official open to the public Eastgate social media without the express agreement of the individual being identified. Without special individual agreements, the collection of personal details and photographs will be used for the following primary purposes:

- a. Creating membership lists
- b. Creating telephone directories
- c. Conducting Church fellowship activities
- d. For promotional, celebration or encouragement conducted wholly within the fellowship.
- e. Providing pastoral care
- f. Contacting members and adherents of Eastgate by physical or electronic means.

We collect your Personal Information for the primary purpose of ministering to you and assisting you to minister to others within the Eastgate fellowship. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where feasible, explain to you why we are collecting the information and how we plan to use it.

#### ***Sensitive Information***

Sensitive Information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

The primary 'Sensitive Information' that Eastgate collects is health related. The main forms that this health related information takes is food allergies and other health issues that you want us to consider when we gather together.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

## ***Security of Personal Information***

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure. However the majority of the Personal Information is produced in our photo directories which are only available to members and adherents who themselves participate in the photo directory. A condition of access by members or adherents to any of this collected Personal Information is that the person gaining access will agree to be bound by this policy document.

Other than where required by law to disclose details, no information will be divulged to third parties without the express permission of the individuals being identified. When you provide information for inclusion in the Eastgate Directory we consider this to be 'express permission' for the information provided to be shared by other users of the directory.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

## ***Access to your Personal Information***

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Eastgate will not charge any fee for your access request

In order to protect your Personal Information we may require identification from you before releasing the requested information.

## ***Maintaining the Quality of your Personal Information***

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to minister to you.

## ***Policy Updates***

This Policy may change from time to time and is available on our website.

## ***Privacy Policy Complaints and Enquiries***

If you have any queries or complaints about our Privacy Policy please contact us at:

P.O. Box 269  
Drayton North QLD 4350  
Australia

[admin@eastgatebiblechurch.com](mailto:admin@eastgatebiblechurch.com)

Phone: 0412 625 381