

Privacy Policy – St.George Foundation

Updated October 2020

About Us

In this policy, “we”, “us” and “our” means St.George Foundation Limited as trustee for St.George Foundation Trust (ABN 44 661 638 970) (“**St.George Foundation**”).

At St.George Foundation, the privacy and security of your personal information is very important to us. Earning and maintaining your trust by carefully and respectfully managing your personal information is paramount.

We are bound by the *Privacy Act 1988* (Cth) (‘Privacy Act’) and must protect your personal information according to the Privacy Act and other applicable privacy and data protection laws, including the *General Data Protection Regulation (EU) 2016/679* and the *Data Protection Act 2018* (UK) (“**Privacy Laws**”).

This privacy policy explains how we collect, maintain, use and disclose personal information.

This privacy policy does not apply to third parties that may be linked or associated with our website. Those website owners are responsible for the privacy of the information they collect and should be contacted directly for details of their privacy policies.

What is personal information?

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from that information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it. Some examples of personal information that we may collect about you include your:

- first name and surname;
- contact details such as telephone numbers, home address, mailing address (if different) and email address;
- date of birth;
- photographs or video or audio recordings.

As a general rule, we do not collect ‘sensitive information’, a sub-category of personal information under Privacy Laws, about you. However, in circumstances where we require sensitive information from you for a lawful purpose, we will seek your consent to collect it.

If you do not provide the personal information we reasonably request, we may be unable to assess your application, accept your donation, process a payment to us or engage you as a volunteer for St. George Foundation, facilitate access to the full functionality of our website (as relevant), or provide information about our grants and events programs.

What information do we hold?

Generally, we keep a record of information provided by you and people nominated by you, which may include one or more of the following types of information:

- information that identifies you, such as your name and address and other information provided by you and people nominated by you;
- if you make a donation or other payment, financial data recording that donation or payment (no credit card information will be held beyond what is necessary to process a donation or payment);
- if you apply for funding, applications for funding submitted by you and the outcomes of those applications; and
- records of conversations and other correspondence you may have with St.George Foundation in the form of contact notes made by St.George Foundation staff.

How we generally collect your information

Generally, we only collect personal information that you provide directly about yourself, unless it is not reasonable or practical for us to do. However, in some circumstances, we may also collect information about you from third party organisations. We collect this information from:

- Westpac Banking Corporation (ABN 33 007 457 141) and its related entities;
- publicly available sources of information, such as public registers;
- your representatives (including your legal adviser, executor, administrator, guardian, trustee or attorney);
- other organisations, such as GalaBid, Good2Give, GoFundraise and SmartyGrants, who jointly with us, facilitate our grant making and fundraising services;
- partner organisations within the Westpac Group;
- social media platforms if you publicly comment or send us a private message (but we will never ask you to give us personal information publicly over LinkedIn or any other social media platform that we use);
- third party websites, applications or platforms containing interactive Westpac Group content or that interface with our own websites and applications.

If you provide us with personal information about another individual, you acknowledge that you have their consent to do so and have informed them about the contents of this policy.

Some of these third parties may store your personal information overseas, including GalaBid and SmartyGrants. Please refer to the privacy policy of the relevant organisation or company for more details.

Collection of cookies and related data by Westpac Banking Corporation

The St.George Foundation website is owned and operated by Westpac Banking Corporation (ABN 33 007 457 141) (**Westpac**). Westpac uses technology called cookies when you visit the St.George Foundation website. Cookies are small pieces of information stored in your hard drive or in memory. They can record information about your visit to the website, allowing it to remember you the next time you visit and provide a more meaningful experience. One of the reasons for using cookies is to

offer you increased security. The cookies Westpac sends to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action. They are designed so that they cannot be sent to another site, or be retrieved from any non-St.George Foundation or Westpac Group site.

Each time you visit our websites, Westpac may collect information about you in accordance with the [Westpac Privacy Policy](#), which may include personal information, such as:

- the date and time of visits;
- the pages viewed and your browsing behaviour;
- how you navigate through the site and interact with pages (including fields completed in forms and applications completed);
- general location information;
- information about the device used to visit our website (including your tablet or mobile device) such as device IDs; and
- IP addresses. Your IP Address is a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP).

The GDPR does not apply to the processing of personal data by St.George Foundation. However, if you are located in the European Economic Area, the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”) may apply to Westpac’s collection, use, disclosure and processing of your personal data (including cookies and related data) via the St.George Foundation website. For these processing activities, Westpac is the data controller for the purposes of the GDPR and EU data protection law.

Please refer to the [EU Data Protection Policy](#) for information about how Westpac manages your personal data and rights that may be available to you as a data subject under the GDPR.

How we may use your personal information?

We collect and use your personal information for the following purposes:

- help us process your application for funding or your donation to St.George Foundation and contact you regarding the outcome of your funding request;
- reply to questions you have asked;
- provide you with promotional information and updates about St.George Foundation (for example, details of fundraising activities or upcoming events);
- comply with our legal obligations (for example, anti-money laundering regulations – see also below);
- ensure our internal business operations are running smoothly, which may include fulfilling legal requirements and conducting confidential systems maintenance and testing.

Personal Information we don't request

If we receive personal information about you that we do not request directly from you or from another party, we will decide whether we could have collected the information in accordance with this Privacy Policy and applicable Privacy Laws.

If we decide that we could have collected the information in accordance with this Privacy Policy and applicable Privacy Laws, we will keep the information and handle it in accordance with this Privacy Policy and applicable Privacy Laws.

If we decide that we could not have collected the personal information in accordance with this Privacy Policy and applicable Privacy Laws, we will destroy or de-identify the information if it is lawful and reasonable to do so.

How we share your personal information with third parties

We may disclose or share your personal information with various third parties but only for the purposes listed above or as otherwise permitted by the Privacy Laws. Such disclosures may be made to:

- our contracted service providers and organisations associated with St.George Foundation's purposes, including Westpac Banking Corporation and its related entities;
- persons involved in the assessment of nominations or applications, such as Governors of St.George Foundation and Westpac Group employees assisting with the assessment and selection process including foundation, legal, risk and finance reviewers;
- persons involved in the establishment and maintenance of our programs involving the provision of non-financial support (e.g. volunteer and pro bono support);
- service providers, such as travel consultants, information providers, media agencies, event organisers, advisors and agents;
- Australian and foreign law enforcement agencies, bodies, authorities and courts or where required to do so by law; and
- other persons that we need to deal with in assessing a grant application, application to be a volunteer, awarding a Grant or volunteer role with St.George Foundation or otherwise in connection with a grant or fundraising program, such as referees, community representatives.

How we protect the security of your information

We take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or disclosure.

Your personal information may be processed or stored on third party computer systems, databases and/or servers (including those of Westpac Banking Corporation), which will be located in Australia.

Your personal information may be stored in hard copy documents or in electronic form in our computer systems. We use a range of physical, electronic and other security measures to protect the security, confidentiality and integrity of your personal information which is held by us. For example, your personal information is stored in secured office premises, in electronic databases requiring

logins and passwords for access. Access to information stored electronically is restricted to staff and contractors whose job purpose requires access. We require all staff and contractors to maintain the confidentiality of customer information. All Westpac employees that undertake work for St. George Foundation are required to complete training about information security and we regularly monitor and review our compliance with internal policies and industry best practice.

Any visitor, for any purpose, to any part of our premises in which customer personal information is kept is required to register with a security desk or be accompanied by a member of staff while in the premises.

Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you have with us has been compromised), please immediately notify us of the problem by contacting us (see Contact Us section below).

As required by Privacy Laws, we use secure methods to destroy or permanently de-identify any personal information as soon as the law permits, provided the information is no longer needed by us for a permitted purpose.

Changes to our Privacy Policy

We may amend this privacy policy from time to time for any reason, for example, if we change the way we handle personal information or for compliance with legal or regulatory updates. We will notify you of any change to this policy before being implemented. The latest, up-to-date version of this policy will be available on the St. George Foundation website.

What happens if you do not provide your personal information to us?

You need not give us any personal information about you or any other person which may be requested in our communications with you. However, without that information, we may not be able to assist you, for example, in processing your grant application or in receiving your donation.

Access to your information

You can request access at any time to personal information we hold about you by contacting stgeorgefoundation@stgeorge.com.au and we will process your request within a reasonable time.

Sometimes we are not required to provide you with access - for example, if the law says we can deny access. If we refuse you access to your personal information, we will tell you the reason why.

Correction of information

We try to ensure that all information we hold about you which we collect, use or disclose is accurate, complete and up to date. If there are any changes to your personal information, grant applicants must notify Smartygrants by emailing service@smartygrants.com.au. St. George Foundation partners please email stgeorgefoundation@stgeorge.com.au.

You may ask us at any time to correct personal information held by us about you, which you believe is incorrect or out of date. We will deal with your request within a reasonable time.

Contact us

If you have any questions, concerns or complaints about our privacy policy or practices please contact us.

St.George Foundation

Address: Level 19, 275 Kent Street, Sydney NSW 2000

Phone: 1300 726 023

Email: stgeorgefoundation@stgeorge.com.au

We will try to answer any questions you may have, correct any error on our part or resolve any complaint that you may have about our information handling practices. Under the Privacy Act you may also complain to the Office of the Australian Information Commissioner (OAIC) about the way we handle your personal information. The Commissioner can be contacted at:

GPO Box 5218

Sydney NSW 2001

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Online: www.oaic.gov.au