

# Lutheran Laypeople's League of Australia Limited

## Privacy Policy

Lutheran Laypeople's League of Australia Ltd (ABN 25 044 678 441) ('we', 'us', 'our') is bound by the Australian Privacy Principles under the Privacy Act 1988 (Cth) (Privacy Act).

This Privacy Policy outlines how we deal with your personal information, as well as our legal obligations and rights as to that information. If we agree with you to use or disclose any of your personal information in ways which differ to those stated in this Privacy Policy, the provisions of that agreement will prevail to the extent of any inconsistency.

### 1. Key types of information

The term "Personal information" means information or an opinion about an individual who is identified, or who can reasonably be identified, from the information. Although we try to make sure that all information we hold is accurate, "personal information" also includes any inaccurate information about the individual.

### 2. Collection

Wherever possible, we will collect personal information directly from you. This information will generally come from what you provide in your application for one of our products or services and supporting documentation.

We only ask for personal information relevant to our business relationship with a customer. When you apply for or use one of our products or services, we may request:

- identifying information, like your name, address and other contact details and your date of birth
- personal details such as gender and marital status
- identifiers like your driver's licence number
- your tax residency details and taxpayer identification number (including tax file number)
- any information we are required to collect by law

We may also collect personal information about you from third parties, such as any referees that you provide, the Lutheran Church of Australia as well as third party service providers.

### 3. Use

We may use your personal information for the purpose of providing products and services to you and managing our business. This may include:

- assessing and processing your application for the products and services we offer
- establishing and providing our systems and processes to provide our products and services to you
- executing your instructions
- uses required or authorised by law
- maintaining and developing our business systems and infrastructure
- research and development

- managing our rights and obligations regarding external payment systems
- advising you of the support that we provide to the Lutheran Church of Australia and/or products or services we think you might be interested in which we may do by contacting you via forums such as email, phone, social media, mail or website

We do not use or disclose your personal information for a purpose other than:

- a purpose set out in this Privacy Policy
- a purpose you would reasonably expect
- a purpose required or permitted by law
- a purpose otherwise disclosed to you to which you have consented

### 4. Disclosure

We may disclose your personal information to other organisations, for example:

- external organisations that are our assignees, agents or contractors
- external service providers to us, such as organisations which we use to verify your identity, payment systems operators, mailing houses and research consultants
- our professional advisors, such as lawyers and auditors
- the Lutheran Church of Australia
- your representative, for example, lawyer, financial advisor or attorney, as authorised by you
- if required or authorised by law, to government and regulatory authorities

We will take reasonable steps to ensure that these organisations are bound by sufficient confidentiality and privacy obligations with respect to the protection of your personal information.

We may disclose your personal information overseas e.g. name, address and email address. We will not disclose your financial information overseas. The countries where we may disclose your personal information include the United States of America and Germany. However, if we do disclose this information outside Australia, we will do so on the basis that the information will be used only for the purposes set out in this Privacy Policy.

## 5. Sensitive information

Where it is necessary to do so, we may collect personal information about you that is sensitive. Sensitive information includes information about an individual's health, and membership of a professional or trade association.

Unless we are required or permitted by law to collect that information, we will obtain your consent.

## 6. Security

We take all reasonable steps to ensure that your personal information held on our website or otherwise, is protected from:

- misuse, interference and loss
- unauthorised access, disclosure or modification

Your personal information may be held by us in paper or electronic form. All personal information is stored within secure systems which are in controlled facilities. There are restrictions on who may access personal information and for what purposes. Our employees, contractors, service providers and authorised agents are obliged to respect the confidentiality of personal information held by us.

If we suspect or believe that there has been any unauthorised access to, disclosure of, or loss of, personal information held by us, we will promptly investigate the matter and take appropriate action, and we will comply with any obligations in relation to notifiable data breaches that are in force under the Privacy Act.

We ask you to keep your passwords, personal identification numbers, tokens and other devices safe, in accordance with our suggestions as located on our website.

When we no longer require your personal information (including when we are no longer required by law to keep records relating to you), we take reasonable steps to ensure that it is destroyed or de-identified.

## 7. Website

This section explains how we handle personal information collected from our website. If you have any questions or concerns about transmitting your personal information via the internet, you may contact our Privacy Officer, whose details are in paragraph 13 of this Privacy Policy, as there are other ways for you to provide us with your personal information.

### Visiting our website

Anytime you access our website we will collect information about your visit, such as:

- the time and date of the visit
- any information or documentation that you download
- your browser type
- internet protocol details of the device used to access the site.

### Cookies

A "cookie" is a small text file which is placed on your internet browser and which we may access each time you visit our website. When you visit the secured pages of our website i.e. pages that you have to provide login details to access, we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website i.e. public pages that you can access without providing login details, we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies, but doing so might prevent you from accessing the secured pages of our website.

### Email

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so.

### Security

We use up-to-date security measures on our website to protect your personal information. Any data containing personal information which we transmit to you via the internet is encrypted. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at your own risk.

### Links on our website

Our website may contain links to third party websites. The terms of this Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information you will need to obtain a copy of their privacy policy.

## 8. Access

You may request access to the personal information that we hold about you at any time from our Privacy Officer whose details are in paragraph 13 of this Privacy Policy.

We will respond to your request for access within a reasonable time. If we refuse to give you access to any of your personal information, we will provide you with reasons for the refusal and the relevant provisions of the Privacy Act that we rely on to refuse access. You can contact our Privacy Officer if you would like to challenge our decision to refuse access.

We may recover the reasonable costs of our response to a request for access to personal information.

## 9. Accuracy

We take reasonable steps to make sure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. However, if you believe your information is incorrect, incomplete or not current, you can request that we update this information by contacting our Privacy Officer whose details are in paragraph 13 of this Privacy Policy.

## 10. Marketing

We may use your personal information, including your contact details, to provide you with information about products and services, including those of other organisations, which we consider may be of interest to you, unless you request not to receive marketing communications. If you are on the Do Not Call Register while you are our customer we will infer from our relationship with you that you consent to receiving telemarketing calls from us, unless you notify us that you do not wish to receive such calls.

You may request at any time not to receive marketing communications or not to receive them through a particular channel, like email. You can make this request by contacting our Privacy Officer whose details are in paragraph 13 of this Privacy Policy, or by 'unsubscribe' from our email marketing messages, which always include an unsubscribe option.

Unless we have first obtained your consent, we will not provide your personal information to other organisations to use for their marketing purposes.

## 11. Changes to the Privacy Policy

We may make changes to this Privacy Policy from time to time (without notice to you) that are necessary for our business requirements or the law.

## 12. Questions and complaints

If you have any questions, concerns or complaints about this Privacy Policy, or our handling of your personal information, please contact our Privacy Officer whose details are in paragraph 13 of this Privacy Policy. You can also contact the Privacy Officer if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, we will respond to you as soon as possible. We will aim to deal with your complaint at the source of your complaint.

If you are not satisfied with the response you receive, please let us know and we will investigate further and respond to you.

If you are still not satisfied, you can contact the Australian Financial Complaints Authority which is our external dispute resolution scheme or the Office of the Australian Information Commissioner.

Australian Financial Complaints Authority  
Post: GPO Box 3 Melbourne VIC 3001  
Telephone: 1800 931 678  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
Website: [www.afca.org.au](http://www.afca.org.au)

Director of Privacy Case Management  
Office of the Australian Information Commissioner  
Post: GPO Box 5218 Sydney NSW 2001  
Telephone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)

## 13. Privacy Officer

Our Privacy Officer's contact details are:

Lutheran Laypeople's League of Australia Ltd  
PO Box 45 North Adelaide 5006  
1800 556 457  
[privacy.officer@lll.org.au](mailto:privacy.officer@lll.org.au)