

A group of young children, mostly girls, are sitting at wooden desks in a classroom. They are looking towards the camera with various expressions. The classroom has wooden walls and large windows in the background showing greenery. The text "SEAPC LIMITED" is overlaid in white on a dark background across the middle of the image.

SEAPC LIMITED

Privacy Policy

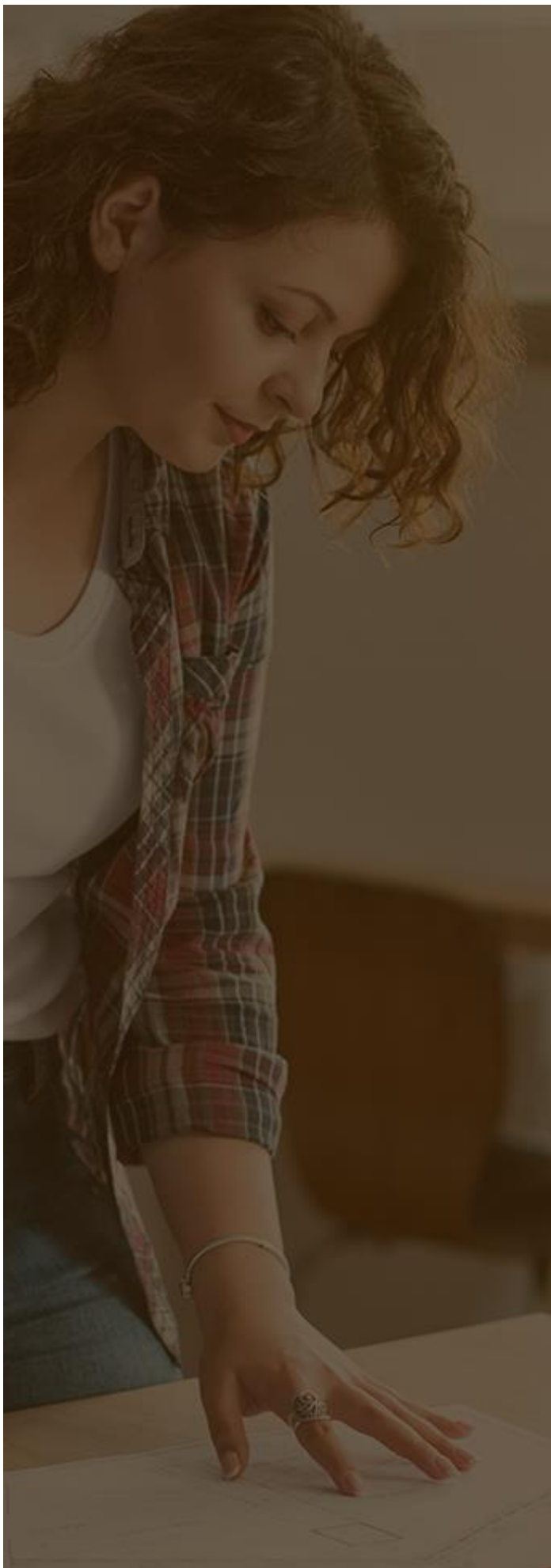


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I. Document Information

Title:	Privacy Policy
Approved By:	SEAPC Limited Board
Policy Owner:	Nina Chen
Policy Delegate:	Nil
Date Issued:	22 November 2024
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2. Policy

2.1 Purpose and Scope

This Privacy Policy outlines how SEAPC Limited (referred to as "we", "our", or "us") collects, uses, discloses, and stores personal information in compliance with the Australian Privacy Principles (APPs) under the *Privacy Act 1988 (Cth)*. It applies to all personal information collected about individuals, including clients, partners, donors, staff, and volunteers.

2.2 Policy Statement

SEAPC Limited is committed to protecting the privacy and confidentiality of personal information. We only collect, store, use, and disclose personal information for purposes directly related to our charitable purposes, and in ways that are lawful, fair, and transparent.

2.3 Responsibilities

- **Responsible People:** SEAPC Board Members and management are accountable for ensuring compliance with the Privacy Act and APPs.
- **Staff and Volunteers:** All staff and volunteers are required to follow this Privacy Policy and associated procedures.

2.4 Collection of Personal Information

We may collect the following types of personal information:

- Names, addresses, and phone numbers
- Email addresses
- Bank account or credit card details (for donors)
- Employment details
- Information related to services provided, including sensitive information where consent is provided (e.g., health or education records).

We collect this information to:

- Provide services to clients
- Communicate with donors, supporters, and volunteers
- Maintain accurate records for accountability and funding purposes
- Manage partnerships with strategic partners such as New Hope Children's Home (Cambodia), SEAPC US, and SEAPC Cambodia.

2.5 Use and Disclosure of Personal Information

We use personal information for the primary purposes for which it is collected or for related purposes where the individual would reasonably expect us to use it.

We may disclose personal information to:

- Strategic partners (e.g., NHCH, SEAPC US, SEAPC Cambodia) for collaborative purposes, where necessary, and only with consent or reasonable expectation.
- Third parties such as service providers and contractors, ensuring they comply with privacy obligations.
- Regulatory bodies as required by law.

2.6 Data Storage and Security

SEAPC Limited takes reasonable steps to protect personal information from misuse, loss, unauthorized access, modification, or disclosure by:

- Using secure electronic systems and physical storage methods

- Limiting access to personal information to authorized personnel only
- Conducting periodic reviews of third-party contracts to ensure data security compliance.

2.7 Consent and Transparency

We ensure individuals are informed about:

- Why their information is being collected and how it will be used.
- The option to remain anonymous or use a pseudonym, where practicable.
- Their rights to access and correct their personal information.

2.8 Cross-Border Data Disclosure

When sharing personal information with our international strategic partners (e.g., SEAPC Cambodia, SEAPC US, NHCH), we ensure:

- Reasonable steps are taken to ensure the overseas recipient complies with APPs.
- Consent is obtained before disclosing information overseas.

2.9 Access and Correction

Individuals can request access to their personal information or request corrections by contacting SEAPC Limited. Requests will be processed promptly, except where an exception applies under the Privacy Act.

2.10 Complaints

Complaints regarding breaches of this policy or the Privacy Act can be directed to SEAPC Limited. We will respond within 30 days. Complaints can also be escalated to the Office of the Australian Information Commissioner (OAIC) if unresolved.

2.11 Policy Review

This policy is reviewed annually or as required by changes in legislation or operations.

2.12 Checklist for Privacy Compliance

1. Collection:

- Clearly define the purpose for data collection.
 - Collect only information necessary for activities.
- 2. Consent:**
- Obtain consent for sensitive information.
 - Provide individuals the option to remain anonymous where possible.
- 3. Use and Disclosure:**
- Use personal information only for primary purposes or with consent.
 - Ensure proper agreements with third parties and strategic partners.
- 4. Storage and Security:**
- Use secure methods for data storage.
 - Restrict access to personal information.
- 5. Cross-Border Disclosure:**
- Obtain consent for overseas data sharing.
 - Ensure overseas partners comply with APPs.
- 6. Access and Correction:**
- Provide a process for individuals to access and correct their information.
- 7. Transparency:**
- Clearly communicate privacy practices to individuals.
- 8. Complaints:**
- Establish a clear complaints process.

Disclaimer

The information provided in this Privacy Policy is for general informational purposes only and is not intended as legal advice. While SEAPC Limited has taken reasonable steps to ensure that the contents of this Privacy Policy are accurate and compliant with Australian Privacy Principles (APPs) under the *Privacy Act 1988 (Cth)*, privacy laws can be complex and subject to change.



SEAPC Limited requires all sponsors and donors to consent to and agree with the Privacy Policy before providing personal information or engaging with us. By supporting SEAPC Limited, sponsors and donors confirm that they understand and accept the terms outlined in this policy.

SEAPC Limited recommends that individuals or organisations seeking advice on their specific privacy obligations consult with a qualified legal professional or privacy expert. SEAPC Limited disclaims all liability for actions taken or not taken based on the content of this Privacy Policy.

If you have specific concerns about privacy or data protection in relation to SEAPC Limited, please contact us directly for clarification or further information.



END OF DOCUMENT