



Privacy Policy

1. Introduction

1.1 From time to time The Two Wolves: Community Cantina ("**we**", "**us**", "**our**"), operating as an entity of The Society of Jesus Mission Formation, is required to collect, hold, use and/or disclose personal information relating to individuals (including, but not limited to, its customers, contractors, suppliers, volunteers and employees) in the performance of its business activities.

1.2 This document sets out our policy in relation to the protection of personal information, as under the *Privacy Act 1998* (Cth) the ("**Act**") and the Australian Privacy Principles ("**APP**").

1.3 The APPs regulate the handling of personal information.

2. What is Personal Information?

2.1 Personal information means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

3. Personal Information that We Collect

3.1 We collect personal information that is reasonably necessary for our operations or activities – this includes name, email address and contact number from people such as employees, customers, donors, suppliers, volunteers and service providers.

4. Sensitive information

4.1 We will only collect sensitive information where you consent to the collection of the information and it is reasonably necessary for one or more of our operations or activities. Sensitive information includes, but is not limited to, information or an opinion about racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, membership of a trade union, sexual preferences, criminal record, health information or genetic information.

5. How We Collect and Hold Personal Information

5.1 We collect personal information only by lawful and fair means and directly from you if it is reasonable or practicable to do so. We collect personal information in a number of ways, including without limitation:

- (a) through application forms;
- (b) by email or other written mechanisms;
- (c) over a telephone call;
- (d) in person;
- (e) through transactions;
- (f) through our website;
- (g) through surveillance camera;
- (h) by technology that is used to support communications between us;
 - i) through publically available information sources (which may include telephone directories, the internet and social media sites);
 - ii) direct marketing database providers

5.2 When we collect personal information about you through publicly available information sources, we will manage such information in accordance with the APPs.



5.3 At or before the time or, if it is not reasonably practicable, as soon as practicable after, we collect personal information, we must take such steps as are reasonable in the circumstances to either notify you or otherwise ensure that you are made aware of the following:

- a) our identity and contact details;
- b) that we have collected personal information from someone other than you or if you are unaware that such information has been collected;
- c) that collection of personal information is required by Australian law, if it is;
- d) the purpose for which we collect the personal information;
- e) the consequences if we do not collect some or all of the personal information;
- f) any other third party to which we may disclose the personal information;
- g) our privacy policy contains information about how you may access and seek correction of personal information held by us and how you may complain about a breach of the APPs; and
- h) whether we are likely to disclose personal information to overseas recipients, and the countries in which those recipients are likely to be located.

5.4 **Unsolicited personal information** is personal information that we receive which we did not solicit. Unless we determine that it could have collected the personal information in line with the APPs or the information is contained within a Commonwealth record, we must destroy the information to ensure it is de-identified.

6. Purposes for Which We Collect, Hold, Use and/or Disclose Personal Information

6.1 We will collect personal information if it is reasonably necessary for one or more of our operations or activities. These purposes include, but are not limited to:

- (a) Marketing
- (b) Volunteering and other support
- (c) Customer service management
- (d) Surveys and general research; and
- (e) Business relationship management.

6.2 We may also collect, hold, use and/or disclose personal information if you consent or if required or authorised under law.

6.3 Direct marketing:

- (a) We may use or disclose personal information (other than sensitive information) about you for the purpose of direct marketing (for example, advising you of new goods and/or services being offered by us, campaigns, donations, events, causes).
- (b) We may use or disclose sensitive information about you for the purpose of direct marketing if you have consented to the use or disclosure of the information for that purpose.
- (c) You can opt out of receiving direct marketing communications from us by contacting the Privacy Officer by post, email, telephone or if permissible, accessing our website and unsubscribing appropriately. By electing not to opt-out, we will assume we have your implied consent to receive similar information and communications in the future.

7. Disclosure of Personal Information

7.1 We may disclose your personal information for any of the purposes for which it was collected, as indicated under clause 6 of this policy, or where we are under a legal duty to do so.

7.2 Disclosure will usually be internally and to related entities or to third parties such as contracted service suppliers.



7.3 Before we disclose personal information about you to a third party, we will take steps as are reasonable in the circumstances to ensure that the third party does not breach the APPs in relation to the information.

8. Access to Personal Information

8.1 If we hold personal information about you, you may request access to that information by putting the request in writing and sending it to the Privacy Officer. We will respond to any request within a reasonable period, and you agree we may charge you the reasonable costs we have incurred in supplying you with access to the personal information.

8.2 There are certain circumstances in which we may refuse to grant you access to the personal information. In such situations we will give you written notice that sets out:

- (a) The reasons for the refusal; and
- (b) The mechanisms available to you to make a complaint.

9. Correction of Personal Information

9.1 You may ask us to update, correct or delete the personal information we hold about you by making a request in writing addressed to the Privacy Officer to correct the information. We will respond to any request within a reasonable period.

9.2 If we hold personal information that is inaccurate, out-of-date, incomplete, irrelevant or misleading, we must take steps as are reasonable to correct the information.

9.3 There are certain circumstances in which we may refuse to correct the personal information. In such situations we will give you written notice that sets out:

- (a) The reasons for the refusal; and
- (b) The mechanisms available to you to make a complaint.

9.4 If we correct personal information that we have previously supplied to a third party and you request us to notify the third party of the correction, we will take such steps as are reasonable to give that notification unless impracticable or unlawful to do so.

10. Integrity and Security of Personal Information

10.1 We will take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that it:

- (a) Collects is accurate, up-to-date and complete; and
- (b) Uses or discloses is, having regard to the purpose of the use or disclose, accurate, up-to-date and complete.

10.2 We will take steps as are reasonable in the circumstances to protect the personal information from misuse, interference, loss and from unauthorised access, modification or disclosure.

10.3 If we hold personal information that we no longer need for any purpose for which the information may be used or disclosed, the information is not contained in any Commonwealth record and we are not required by law to retain the information, we will take such steps as are reasonable in the circumstances to destroy the information or to ensure it is de-identified.

11. Anonymity and Pseudonymity

11.1 You have the option of not identifying yourself, or using a pseudonym, when dealing with us in relation to a particular matter. This does not apply:



- (a) Where we are required or authorised by or under an Australian law, or a court/tribunal order, to deal with individuals who have identified themselves; or
- (b) Where it is impracticable for us to deal with individuals who have not identified themselves or who have used a pseudonym.

11.2 However, in some cases if you do not provide us with your personal information when requested, we may not be able to respond to your request, offer you the goods or services that you are requesting, or provide you with information about our goods and/or services, events, or causes.

12. Complaints

12.1 You have a right to complain about our handling of your personal information if you believe we have breached the APPs.

12.2 If you wish to make such a complaint to us, you should first contact the Privacy Officer in writing. Your complaint will be dealt with in accordance with our complaints procedure and we will provide a response within a reasonable period.

12.3 If you are unhappy with our response to your complaint, you may refer the matter to the Office of the Australian Information Commissioner.

13. Privacy Officer Contact Details

13.1 Our Privacy Officer can be contacted in the following ways:

- (a) Telephone number: (02) 039 3595
- (b) Email address: info@thetwowolves.com.au
- (c) Postal address: The Two Wolves: Community Cantina, 202 Broadway, Chippendale Sydney NSW 2008