

## **TRINITY NETWORK OF CHURCHES PRIVACY POLICY**

Your privacy is important to the Trinity Network of Churches and Trinity Church Modbury. We recognise our responsibilities with regard to dealing carefully and properly with the information we collect and retain for our ministry purposes. We are committed to protecting your privacy, caring for you, and upholding our obligations under the Privacy Act 1988 in accordance with Scripture. We may change this Policy from time to time. A copy of the current Policy will be available on our website.

### **Background**

Trinity Church Modbury is part of the Trinity Network of Churches.

### **Collection of Information**

We collect information only for the purposes of the ministry and related activities of the Trinity Network of Churches. No one is under any compulsion to give us any personal information unless they wish to.

We are committed to helping you understand the Gospel and know Jesus. We are also committed, as God's people, to look after you and to look to your interests in addition to our own. To help us protect and care for you, it is necessary for us to know you and the people who come in contact with us. As such, we may collect general information about you (such as your name, address, and contact details including an emergency contact) so that we can contact you and minister to you effectively.

We may also collect personal information during the course of dealing with you, for example when you register for conferences or events and when you participate in Church activities or complete other forms. The information collected may include some sensitive information such as your religious affiliation with us, health information or ethnic origins. We may also collect financial information (such as your credit card details, where you provide them) for facilitating financial giving to Trinity or your Working With Children Check number where required for participating in kids-related ministries.

### **How do we collect information**

Where practicable, the purpose for which we collect personal information will be made clear at the time of collection. We will not collect sensitive information about you unless you specifically choose to volunteer it to us and we will not disclose your information without your prior consent.

We may collect private information about you or your family members:

- Through our websites
- Attendance at a Trinity Network event or church service
- If you contribute financially to support the ministry of Trinity
- Our forms including sign-up and registration forms
- Information received in public meetings, smaller group meetings and from written responses to our communication to you
- You provide necessary private information for children (under 18 years) who attend an event/church service.
- We may collect private information directly from you, however there are circumstances where children (under 18) connected with our children or youth ministry may provide us with parental information for medical care purposes.
- Through public records if necessary for verifying information you provide to us.

Personal information about former members may be retained for a period of time.

### **Use and Disclosure of Information –**

We use information only for the purposes we have declared at the time of collection, or otherwise as set out in this Privacy Policy. Permission will be sought before using the information in any other way unless authorised or required by law.

In keeping with our purpose, we may make your information available to our staff, ministry leaders, trainees, relevant volunteers or other entities in the Trinity Network. Such information excludes any financial or sensitive information you may choose to provide to us.

Your financial information may be made available exclusively to our trustees, business, and finance managers who have responsibility for the financial matters of the Trinity Network of Churches. We may disclose your financial information to third parties with your consent for purposes of managing giving to the Trinity Network of Churches, including setting up regular giving.

Any sensitive information you choose to provide to us will not be disclosed to any party without your consent unless we are required under the law to do so or the disclosure is necessary for the purpose of our ministry. Any information you provide to us will be treated with utmost confidentiality.

Generally, we will only use and disclose your personal information as follows:

- to establish and maintain a record of your involvement and attendance;
- to provide the products or services you have requested from the Church;
- to answer your enquiry;
- to register you for events or conferences; or
- to keep you informed of new developments we believe may be of interest to you (if we contact you in this way, you will have the opportunity to decline any further such communications);

We use a cloud-based church management software provided by PushPay known as Church Community Builder (CCB) to manage and store your personal information ([PushPay Privacy Policy](#)). If you have a personal login to Trinity Network CCB database, you will have the ability to control your communication settings. CCB allows graded privacy and security levels. For more information on this please contact the Privacy Officer (details below):

- If we have your email address and you are registered on CCB as an attender of Trinity Network we will send our weekly e-newsletters. (You can always opt out of these).
- You may receive written communication from the church office.
- You may receive email communication promoting event/church information.

Information (name, address, email and phone contact details) may also be transferred from the CCB database to Planning Centre Online (PCO) or other digital database (for example, Slack) for the purposes of church service rostering and planning. You may receive invitations via PCO to serve in various ways at a church service. You can accept or decline these invitations.

Certain organisations, such as the police and the courts of law have the authority to require us to supply details that may include your personal information. If this occurs, we will comply with the requirements. We will never sell your personal information to a third party.

### **Data Quality and Identifiers**

We will endeavour at all times to keep your personal information accurate, relevant, complete and up-to-date. To assist us with this, please contact us if any of the details you have provided change. Further, if you believe that the information we have about you is not accurate, complete or up-to-date, contact us and we will use all reasonable efforts to correct the information. We require such queries and requests to be in writing and directed to our Privacy Officer (details provided below).

We will not use any Government or agency numbers to identify an individual. Unless required by law we do not retain any personal numbers such as tax file numbers.

### **How do we protect your information?**

Safeguarding the privacy of your information is important to us. We will take reasonable steps to keep secure the personal information which we hold and to protect it from unauthorised disclosure and misuse. Email is not a secure method of transmitting information and so we cannot accept responsibility for the security of information you send to us by email.

We protect your personal detail stored on a digital database (CCB) through encryption, firewalls, secure buildings and computer security systems. PushPay secures data with up to date technology on its servers and

has strong password protection on its servers and for users. See CCB security specifications [Church Community Builder Policy Updates - PushPay](#) website for more detail.

We will never share information about you with any other organisations.

### **Access to and correction of information**

You are entitled to have access to and seek correction of any information that we may hold about you. We require such requests to be in writing and sent to our Privacy Officer (details below). We will provide you with access to your personal information unless we are legally authorised to refuse your request.

The Trinity Network will take appropriate steps to verify your identity (or verify that you act as a legal guardian of the individual concerned) before granting a request to access your information.

We will respond to your request for access to your information within a reasonable time after you make the request and if access is granted, access will be provided within 30 days from your request. Your request for correction will be dealt with within 30 days, or such longer period as agreed by you.

If we deny your request for access or correction, we will provide you with a written notice detailing reasons for the refusal and the process for making a complaint about the refusal to grant your request.

### **Anonymity**

Where lawful and practicable to do so, you can deal with us anonymously or using a pseudonym. The circumstances in which you can deal with us anonymously or using a pseudonym include making a general enquiry about the service times that we can offer to you including in person or via our website or the telephone. From the time you commence attending our church services or participate in other ministry activities, it is no longer practicable for us to deal with you anonymously or using a pseudonym.

### **Cookies**

A cookie is a piece of information that an Internet website sends to your browser when you access information at that site. Cookies indicate to a website that you have been there before and they can be used to record what parts of a website your computer is visiting. Cookies do not identify individual users, although they do allow identification of the type of browser used and the Internet Service Provider (“ISP”).

We use cookies when someone provides their details into our site to retain information for the purpose of our ministry. We do not use cookies to track your internet activity before or after you leave our website.

### **Links**

This website contains links to a number of websites outside of the Trinity Network of Churches that are included on the basis of containing content related to our ministry. When a user has clicked on a link to another site, they leave the Trinity Network site and are no longer protected by this Policy.

### **Openness**

Our privacy policy is available to anyone who wishes to see it.

### **Disclosing and storing information overseas**

If your personal information is managed on CCB, this information is stored overseas. We take all steps reasonable in the circumstances to ensure that your personal information is protected and securely stored. We retain possession and control of your personal information and have contractual arrangements that control how PushPay uses and handles your personal information. Please also refer to the paragraph above regarding the security specifications employed by PushPay.

We do not otherwise disclose personal information overseas.

### **How to opt out of your information being stored or receiving communication.**

You have the right to opt out of individually addressed promotional mailings/emails. If you do not wish to receive further communication from Trinity you can tell us that in writing and we will stop sending such material to you.

### **Complaints**

If you believe that the Trinity Network of Churches has breached a term of this Policy or the Australian Privacy Principles, you may submit a written complaint. The complaint can be emailed or posted to us using the contact details set out below. You must include contact details for us to contact you regarding your complaint.

Our Privacy Policy Officer will consider your complaint and respond as soon as reasonably possible, but not more than 30 days after receiving the complaint.

If you are unsatisfied with the outcome of your complaint you may ask that the Privacy Officer refer the complaint to a higher authority within the Trinity Network, such as the chairman of the Holy Trinity Limited Board. If you still remain unsatisfied with the outcome, you may refer your complaint to the Office of the Australian Information Commissioner to be resolved:

Director of Compliance Office of the Australian Information Commissioner  
GPO Box 5218, Sydney NSW 2001

### **Contacting us**

If you wish to:

- gain access to your personal information;
- make a complaint about a breach of your privacy;
- contact us with a query about how your personal information is collected or used;
- contact us regarding any other matter concerning this Policy,

you can speak directly with our staff who will do their best to try to resolve your issue as simply as possible. Alternatively, you can write to us or send us an email so that our Privacy Officer can consider the matter. We will respond to you as soon as reasonably possible.

Our contact details are as follows:

Phone: 08 8213 7300  
Privacy Officer contact: Andrew Severin, Network Business Manager  
Email address: [privacy@trinity.network](mailto:privacy@trinity.network)  
Postal address: 87 North Terrace, Adelaide, SA 5000