



PRIVACY POLICY

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1 PART A: ABOUT THIS POLICY

1.1 POLICY PURPOSE

This privacy policy explains how the Tasmanian Land Conservancy (TLC) handles personal information it collects about any individual who is not a TLC employee.

Our policy describes:

- The categories of individuals that interact with the TLC (Part B);
- Why and how we collect personal information (Part C);
- The kinds of personal information we collect (Part D);
- The ways in which we use that information (Part E);
- When we disclose that information to others (Part F);
- How to access or correct that information, and our complaints process (Part G); and
- Data quality and data security (Part H).

1.2 OUR OBLIGATIONS UNDER THE PRIVACY ACT

This privacy policy sets out how we comply with our obligations under the *Privacy Act 1988* (Cth) (Privacy Act). We are bound by the [Australian Privacy Principles](#) (APPs) in the Privacy Act, which regulate how we collect, use, disclose and store personal information, and how individuals may access and correct personal information held about them.

In this policy, 'personal information' means 'information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not' (definition from the Privacy Act, section 6).

This Policy was updated following a review by legal firm, HWL Ebsworth, in May 2022, to ensure our compliance with the APPs in the *Privacy Act 1988* (Cth), the *Archives Act 1983* (TAS) (Archives Act), the *Personal Information Protection Act 2004* (Tas), and general common law rights to confidentiality, privacy, and data management. The review and subsequent update incorporated additional recommendations for TLC to ensure a 'best practice' approach to privacy matters

1.3 RELATED DOCUMENTS

- Data Management and Breach Response Procedure

2 PART B: CATEGORIES OF INDIVIDUALS THAT INTERACT WITH THE TLC

To gain a greater understanding of how personal information is handled by the TLC and how it relates to you, please refer to the information below. This includes a description of the categories of individuals referred to throughout this Policy. Following sections identify how personal information is collected, used and disclosed.

2.1 SUPPORTER OR DONOR

A person who has made, or pledged to make, a donation of funds or property to support the TLC's work (including a bequest), has attended or enquired about an event organised or hosted by the TLC, or signed up to receive the TLC's newsletter.

2.2 VOLUNTEER

A person who applies for, or enquires about, a volunteer position and who donates time and effort to support the TLC's work.

2.3 PROSPECTIVE EMPLOYEE

A person who applies for a paid position working for the TLC.

2.4 ONLINE VISITOR

A person who visits the TLC website, or social media platforms (eg Facebook, Twitter, Instagram) on which the TLC operates.

2.5 RESERVE VISITOR

A person who visits, or intends to visit, one of the TLC's reserves (or properties for sale), or attends an activity organised or hosted by the TLC on one of our reserves.

2.6 LANDHOLDER

Any landholder who the TLC deals with. This may include a person who owns land that the TLC may be interested in acquiring or managing, a person who may have approached the TLC offering a gift or sale of land or a land management opportunity, or a person we work with in relation to property covenants, conservation agreements, management actions and acquisitions.

2.7 PARTNER OR STAKEHOLDER

A person who, through the nature of their work (or the work of their organisation) has a formal or informal relationship with the TLC.

2.8 MEMBER

A person admitted to membership of the TLC in accordance with the TLC's Constitution.

2.9 BOARD AND SUB-COMMITTEE MEMBER

A person appointed to the TLC's Board or a TLC Board Sub-committee in accordance with the TLC's Constitution.

3 PART C: COLLECTION OF PERSONAL INFORMATION

3.1 GENERAL COLLECTION

We collect personal information for the primary purpose of:

- protecting land with high conservation value (eg the purchase and sale of properties, and the management of private land);
- seeking donations and other opportunities to support our work (eg volunteering);
- providing information about our activities (eg sending event information);
- managing our reserves and our conservation work (eg property neighbour details);
- corporate, administrative and other functions (eg governance compliance) and
- staff recruitment.

We generally collect personal information directly from individuals, for example, where you contact us and ask to become a supporter, make a donation, or visit a reserve or property for sale.

We collect banking or credit card details if you want to make payments (e.g. donations) or receive payments (e.g. reimbursement of volunteer expenses or stewardship payments).

If you volunteer or visit our reserves, we may collect health information from you. We do this in case a medical condition affects your ability to participate, needs further management or is relevant in an emergency. We collect information about all first aid or emergency incidents.

If you're an emergency contact (e.g. next of kin), we collect your personal information from the person who nominated you (e.g. a TLC volunteer). We have no means to collect it directly from you.

3.2 SPECIFIC COLLECTION

Specific purposes for collecting personal information depend on what category or categories below apply to you. Some individuals will belong to multiple categories. For example:

- a donor might also volunteer for the TLC;
- a landholder might also be a Board Member; and
- a reserve visitor might also be an employee of a partner organisation.

3.3 SUPPORTERS AND DONORS

Our supporter and donor lists contain the personal information of those who express an interest in our conservation work. We use those lists to distribute information about our activities, to seek donations and to encourage further involvement with the TLC. We may collect personal information regarding your interests to personalise your interactions with us.

If you make a tax deductible gift, we collect your personal information so that we can issue a tax deductible receipt. We must keep these records to comply with tax and fundraising laws. We require banking or credit card details if you want to donate funds via electronic means.

The TLC uses the client relationship management platform Salesforce product. This interfaces with the payment gateway Payments2Us and Windcave. Any paper records detailing credit card information are shredded and deposited in the on-site security bin, which is periodically collected and disposed of. In addition; records the TLC identifies that are no longer required, we will also take such steps as are reasonable in the circumstances to destroy information or to ensure that the information is de-identified in accordance with the TLC's Data Management and Breach Procedure.

We collect personal information directly from individual supporters and donors when we meet you personally, or if you contact us by phone, by email, through social media or in other ways. This is collected only where you express an interest in supporting the TLC or receiving information from us.

3.4 VOLUNTEERS

We collect personal information regarding prospective and current volunteers related to their skills, interests and experience in order to:

- assess their suitability to volunteer with us; and
- match them to suitable projects or roles.

We collect details of volunteer contributions and feedback to manage volunteer involvement.

3.5 PROSPECTIVE EMPLOYEES

We collect personal information regarding prospective employees, their skills, interests, qualifications, health and experience in order to:

- assess their suitability for potential employment with us; and
- match them to suitable projects or roles.

We generally collect personal information directly from the prospective employee, but may also do so from recruitment agents/agencies, recruiters, referees or other knowledgeable parties where relevant to the recruitment assessment process.

3.6 ONLINE VISITORS

We collect information about visitors to our websites for statistical purposes. However, due to the nature of internet protocols, that information might contain information which personally identifies users.

Through our website we use a range of tools provided by third parties (including Google and our web hosting company) that collect or view website traffic information. These sites have their own privacy policies.

In some cases we may also collect personal information through the use of cookies. When users access our website, we may send a “cookie” (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns. We use this to research our users’ habits so that we can improve our online services. Our cookies do not collect personal information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users movements, and gather broad demographic information.

The TLC also uses social networking platforms such as Twitter, Facebook, Vimeo and YouTube to communicate about our work. See the privacy policies for these individual specific platforms on their respective websites.

The addresses for TLC social networking sites and access to them below;

Twitter: https://twitter.com/Tas_Land

Facebook: <https://www.facebook.com/taslandconservancy>

Instagram: <https://www.instagram.com/tasland/>

Vimeo: <https://vimeo.com/tasland>

YouTube: <https://www.youtube.com/channel/UCUMaWbt2OR3LxHadYxr3IIQ>

LinkedIn: <https://www.linkedin.com/company/1268580/>

3.7 RESERVE VISITORS

We collect personal information about our reserve visitors to manage bookings and for visitor safety. We may also collect personal information regarding your experiences in our reserves and photographs of your time in our reserves for publication with your permission.

We may collect health information from you, especially for events on our reserves, hosted by the TLC. We do this in case a medical condition affects your ability to visit, needs further management or is relevant in an emergency. We collect information about all first aid or emergency incidents.

We generally collect personal information directly from you. For groups visiting our reserves, we may collect the personal information from your group's leader, organiser or facilitator. If you're a group leader, we may collect your contact details to administer the group booking.

For visitors to the TLC's properties for sale, we will collect relevant personal information including name, address and mobile number. If a property key is required for access, we may also ask for a drivers licence.

3.8 LANDHOLDERS

If we're considering whether to acquire or otherwise manage land, we collect personal information regarding landholders and their land to enable us to assess the conservation value and environmental significance of that land before proceeding with any acquisition or other land management initiatives. We may collect personal information from or about neighbouring landholders. We may also collect information in relation to covenants, conservation agreements and management actions. We may collect information about people and properties that are part of wildlife monitoring programs or other conservation initiatives.

We generally collect personal information directly from you. We may also collect it from publicly available sources (e.g. land registries, phone directories) or property managers (e.g. estate agents, local conservationists) or nearby landholders (e.g. neighbours).

3.9 PARTNERS AND STAKEHOLDERS

We collect personal information regarding the employees, volunteers and officers of our partner and stakeholder organisations to pursue collaborative projects and matters of common interest.

3.10 MEMBERS

We collect personal information regarding the TLC members to comply with the TLC Constitution and to maintain a membership register under the *Associations Incorporation Act 1964* (Tas). We collect member personal information directly from the member to send the Annual Report and Annual General Meeting notification.

3.11 BOARD AND SUB-COMMITTEE MEMBERS

We collect personal information regarding Board Members, and their personal interests to comply with the TLC Constitution and to maintain registers under the *Associations Incorporation Act 1964* (Tas). We also collect personal information regarding the Members of various TLC Sub-committees. Board and Sub-committee Member contact details are needed to convene board meetings and for the overall management of the TLC's activities. These details may also need to be disclosed to government, statutory authorities, banks and others where necessary for the TLC operations. We collect personal information directly from the Board and Sub-Committee Members.

4 PART D: KINDS OF PERSONAL INFORMATION

The kinds of personal information we collect depend on the reasons for interacting with the TLC. This may include:

4.1 SUPPORTERS AND DONORS

- Name
- Addresses (past and present)
- Contact details (phone, email)
- Relationship to other supporters and donors
- Organisation affiliations
- Communication preferences
- Age/date of birth
- Gender
- Specific interests
- Bank account/credit card details
- Donation/support history
- Bequest pledge details (eg estate value, proposed executors)
- Event attendance

4.2 VOLUNTEERS

- Name
- Contact details (address, phone, email)
- Date of birth
- Emergency contacts (name, contact details, relationship)
- Qualifications, skills, experience and employment
- Medical conditions or health information
- History and records of volunteering
- Drivers licence details (for insurance purposes if driving a TLC vehicle)
- Bank account details (for expense reimbursements)
- Number of hours spent volunteering for the TLC

4.3 ONLINE VISITORS

- Server address (e.g. IP address)
- Date and time of visit
- Pages and documents accessed (or liked) during your visit
- Length of time on web pages
- Previous site visited
- Whether you've visited our site before
- Browser details

4.4 PROSPECTIVE EMPLOYEES

- Name
- Contact details (address, phone, email)
- Date of birth
- Application and selection process documents
- Qualifications, skills, experience and employment
- History and records (e.g. performance assessments)
- Drivers or other licence details relating to the role

4.5 RESERVE VISITORS (INCLUDING VISITORS TO PROPERTIES FOR SALE)

- Contact details (address, phone, email)
- Contact details while on the reserve (mobile phone)
- Emergency contacts (name, contact details, relationship to you)
- Medical conditions or health information
- Bank account information if event fees apply
- Drivers licence if a key is required for property access

4.6 PARTNERS AND STAKEHOLDERS

- Name
- Contact details
- Role
- Connection with the TLC
- Contracts and/or reports related to the partnership

4.7 LANDHOLDERS

- Name
- Contact details
- Property information number
- Property size
- Connections with adjoining landholders
- Covenanting information
- Conservation values on the property
- Conservation management plans
- Images and/or information acquired for wildlife monitoring or other conservation programs
- Bank account information (if stewardship payments are to be made)

4.8 MEMBERS

- Name
- Contact details (address, phone, email)
- Membership type (i.e. ordinary member or honorary life member)

- Date membership commenced

4.9 BOARD AND SUB-COMMITTEE MEMBERS

- Name
- Contact details (address, phone, email, assistant details)
- Date and place of birth
- Biographies and/or resumes
- Financial and personal interests which may give rise to conflicts or be required for insurance purposes
- Number of hours spent volunteering for the TLC

We may also collect other personal information which you choose to disclose when interacting with us.

You're not required to give us all the kinds of personal information listed above. However, if you choose not to provide specific information, it may limit your ability to be involved with certain programs. For reserve visitors and volunteers, we will not be responsible for any adverse effects where you do not provide relevant medical conditions or health information that may affect your health and safety, or ability to participate.

5 PART E: USE OF PERSONAL INFORMATION

5.1 GENERAL USE

We will only disclose your personal information:

- for the primary purpose for which it was collected (see part C); or
- for purposes related to the primary purpose; or
- when permitted by the Privacy Act and its APPs; or
- with your consent.

5.2 SUPPORTERS AND DONORS

We only use personal information of supporters and donors for the purposes we collected it (see Part C). This includes distributing information about our activities, to seek and process donations and to encourage further involvement with the TLC. You may request not to receive communication materials from us.

If a bequest has been pledged, we use pledge details to progress receipt of the bequest in accordance with the terms of the will.

To better understand our supporters we may analyse our supporter and donor lists. We may use supporter and donor information to produce reports and statistics regarding our fundraising efforts. The personal information for these uses will be de-identified.

5.3 VOLUNTEERS

We use personal information about our prospective and current volunteers for the purposes we collected it (see Part C). This includes when considering applications, managing their involvement with our work, and maintaining a history of their contributions. We use volunteers' banking details to reimburse volunteers for expenses.

We may also invite prospective and current volunteers to become supporters and to receive information about the TLC's activities. If you agree, your personal information will be placed on our supporter list. Personal information regarding your skills and experience will not be used for any other purpose.

5.4 PROSPECTIVE EMPLOYEES

We use personal information about our prospective employees for the purposes we collected it (see Part C), predominately to consider the application. We may also invite prospective employees to become supporters and to receive information about the TLC's activities. If you agree, your personal information will be placed on our supporter list. Personal information regarding your application will not be used for any other purpose.

5.5 ONLINE VISITORS

We use information regarding website visits and social media trends for the purposes we collected it (see Part C). We may also use your information to personalise your website visit.

5.6 RESERVE VISITORS

We use personal information about our reserve visitors (including visitors to properties for sale) to manage bookings, for visitor safety and to maintain and to protect our reserves.

We use your banking or credit card details to process any fees associated with your visit to a reserve.

We may seek feedback on your reserve visit or to invite you to make a donation and become a supporter. In this case, your personal information will be placed on our supporter list. Personal information regarding your visit will not be used for any other purpose.

5.7 LANDHOLDERS

We use personal information of landholders for the purposes we collected it (see Part C). This includes to assess the conservation value of land, management of values, or to pay landholders stewardship payments.

Landholders may be invited to become a supporter of the TLC (if they aren't already).

5.8 PARTNERS AND STAKEHOLDERS

We use personal information of partners and stakeholders for the purposes we collected it (see Part C). We may also invite those persons to become supporters and to receive information about the TLC's activities.

5.9 MEMBERS

We use personal information of members for the purposes we collected it (see Part C). This includes administering membership obligations under the TLC's Constitution.

5.10 BOARD AND SUB-COMMITTEE MEMBERS

We use personal information of Board and Sub-committee Members for the purposes we collected it (see Part C). This features governance obligations, including setting the strategic direction, overseeing compliance and risk management.

6 PART F: DISCLOSURE OF PERSONAL INFORMATION

6.1 GENERAL USE

We will only disclose your personal information:

- for the primary purpose for which it was collected (see part C); or
- for purposes related to the primary purpose; or
- when permitted by the Privacy Act and its APPs; or
- with your consent; or
- when needed for law enforcement.

During our activities, we may disclose your personal information to our project partners, contractors, consultants, banks, accountants, lawyers or insurers. This is done only when appropriate and, on a need,-to-know basis. We take steps to ensure that those persons keep that information confidential and delete the information when it is no longer needed.

Our technology infrastructure makes use of cloud infrastructure or servers located outside Australia. This means that we may disclose and store your personal information outside Australia, taking such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the Privacy Act's APPs in respect of your personal information.

6.2 SUPPORTERS AND DONORS

Where you have supplied your banking details to us and agreed to make a donation, we will provide your banking details to our bank so they can process the donation from your account. This is done through payment gateway through Payments2Us and Windcave.

We may disclose your name and address to contracted print companies, mail houses, and other suppliers to efficiently send you information about the TLC. In these cases, we take steps to ensure that those recipients:

- keep that information confidential;
- only use that information for the specific campaign; and
- delete the information when the campaign ends.

If you do not wish to receive campaign material from us, please let us know by contacting info@tasland.org.au or 03 6225 1399.

6.3 VOLUNTEERS

We may disclose your personal information to referees, TLC personnel, qualification-issuing organisations and licensing authorities (eg drivers licence) where relevant to the assessment process and ongoing TLC operations.

6.4 PROSPECTIVE EMPLOYEES

We may disclose your personal information to referees, government authorities, qualification-issuing organisations and licensing authorities (eg drivers licence) where relevant to the recruitment process.

6.5 ONLINE VISITORS

As detailed in part C, the TLC uses reports provided by Google Analytics to help us understand website traffic and webpage usage. By using the TLC's website, you consent to the processing of data about you by Google, as described in [Google's Privacy Policy](#) and for the purposes set out above.

Google Analytics does not identify individual users or associate your IP address with any other data which they hold. Google does however, store information across multiple countries. For further information see [Google Data Centers](#) and [Google Company](#).

You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google. For more information see [Google Analytics Opt-out Browser Add-on](#).

Social networking platforms such as Twitter, Facebook, Vimeo and YouTube will also handle your personal information for their own purposes. See the related privacy policies for these individual platforms.

6.6 RESERVE VISITORS

We may disclosure your personal information (including health information) to health practitioners or local authorities in an emergency or if you require aid, should something unexpected occur.

6.7 LANDHOLDERS

We may disclose your personal information to contractors, lawyers, conveyancers and others to assess whether to acquire or otherwise manage land.

6.8 PARTNERS AND STAKEHOLDERS

We may disclose your personal information to fellow partners and stakeholders, contractors and lawyers to develop and implement collaborations, projects and to build professional networks.

6.9 MEMBERS

We are required by law to allow members to inspect the membership register and to take copies. We may supply our membership list to the Commonwealth Government's environment department

for its requirement to maintain the TLC's registration as an environmental organisation, or any other inspection required by law.

6.10 BOARD AND SUB-COMMITTEE MEMBERS

We may supply our Board membership list to the Commonwealth Government's environment department for its requirement to maintain the TLC's registration as an environmental organisation and to the Australian Charities and Not for Profits Commission or for any other inspection required by law. We may be required under the *Associations Incorporation Act 1964* (Tas) to disclose specific personal details to the Consumer Affairs and Fair Trading authorities. These details may then be obtained by the public.

7 PART G: ACCESS, CORRECTION AND COMPLAINTS

7.1 ACCESS AND CORRECTION

You may access, correct or update your personal information we hold about you by contacting us directly.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

We will endeavour to meet reasonable requests for access to your personal information within 30 days of receiving the request. Access charges may apply for expenses incurred by TLC in giving access to this information.

7.2 COMPLAINTS

If you wish to make a complaint about a breach of your privacy, the complaint should be made in writing to the TLC (contact details below). We will treat your requests or complaints confidentially. One of our staff members will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

We may not investigate a complaint if it is considered to be abusive, trivial or vexatious.

8 PART H: OTHER MATTERS

8.1 DATA QUALITY

We take steps to ensure that the personal information we collect is accurate, up to date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed, and at other times as necessary. We will respond to requests for personal information to be corrected within fourteen days.

We will correct any personal information that we hold about you on request. No charges will be incurred in response to requests and any subsequent corrections being made.

We may send you communications about the TLC that we consider may be of interest to you by mail and email. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving communications from us by contacting us (see the details below) or by using opt-out facilities provided in the communications.

For some of the purposes listed above, we may disclose your personal information to entities located outside of Australia, such as our data hosting and other IT service providers, located in the United States. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

8.2 DATA SECURITY

We take steps to protect the personal information we hold about you against loss, unauthorised access, use, modification or disclosure, and against other misuse. These steps include password protection for accessing our electronic IT systems, securing paper files in locked cabinets and physical access restrictions to buildings where information is held.

There are inherent risks in transmitting information across the internet and we do not have the ability to control the security of information collected and stored on third party platforms. In relation to our own servers, we take all reasonable steps to manage data stored on our servers to ensure data security. Where the TLC engages a third party provider, we try to ensure that the provider takes all reasonable steps to manage data stored on their servers to ensure data security.

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

We do not provide your personal information to other organisations for the purposes of direct marketing. This policy means that TLC will not share your personal information with other charities or not-for-profit organisations seeking donations and/or financial support. Please let us know if you are contacted by an organisation seeking donations and/or financial support and you believe that this contact was made based on personal information you have provided TLC. We will then take

all reasonable steps to ensure that your personal information is not used for direct marketing by other organisations.

8.3 HOW TO CONTACT US

You can get more information about this privacy policy and our processes by contacting:

Engagement and Giving Manager
Tasmanian Land Conservancy
ABN 88 743 606 934
PO Box 4558, Hobart TAS 7000
p: 03 6225 1399
e: info@tasland.org.au

8.4 CHANGING THIS POLICY

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

This privacy policy was last updated on 14 June 2022

8.5 FURTHER INFORMATION

Information to compile this plan has been sourced from the OAIC website and Justice Connect.

For more information on managing data breaches, see

<https://www.oaic.gov.au/agencies-and-organisations/guides/data-breach-notification-a-guide-to-handling-personal-information-security-breaches> and <http://www.nfplaw.org.au/privacy>

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