

Privacy Statement

8 October 2019

Celebrants Australia Inc

Privacy Statement

Background

This document sets out the policy of Celebrants Australia Inc A0046556A relating to the protection of the privacy of personal information.

This policy statement is intended to enable members and others who interact with Celebrants Australia Inc to understand what types of personal information we collect, and what we do with such information in performing our functions and in light of our privacy approach.

We are committed to protecting the privacy of the personal information we collect and receive. This Privacy Statement seeks to explain how the Celebrants Australia Inc collects, uses, discloses and otherwise handles personal information. It also seeks to explain how you can access and correct the personal information we hold about you or complain about any suspected privacy breach.

A copy of this Privacy Statement is available on the Celebrants Australia Inc's website. A printed copy can be obtained free of charge by contacting our Privacy Officer (details under Further Information below).

We respect your rights to privacy and any and all the personal information collected on this site will be kept strictly confidential and will not be sold, swapped, or disclosed unless authorised by the member or required by law.

WHAT IS PERSONAL INFORMATION?

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about a living individual who is either identified or reasonably identifiable.

Examples include an individual's name, address, contact number and email address.

OUR OBLIGATIONS

Celebrants Australia Inc is not required to comply with the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth) (Privacy Act) but elect to adhere to them as good business practice. The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection/receipt to use and disclosure, storage, accessibility and disposal.

We are also required to comply with other laws, including more specific privacy legislation in some circumstances and in some jurisdictions, such as:

- Spam Act 2003 (Cth) and Do Not Call Register Act 2006 (Cth);
- Notifiable Data Breaches scheme under Part IIIC of the Privacy Act; and
- applicable data protection and privacy legislation.

The purposes for which we collect, hold, use and disclose personal information

Celebrants Australia Inc is an incorporated association under the Associations Incorporation Act 1981. Its members have voting rights as provided in its registered constitution.

Celebrants Australia Inc collects and processes personal information of its members for the purposes to support them in their endeavours, to promote the services our members offer, and to maintain a high quality and standard of delivery of ceremonies. Members will also act as mentors to each other through internal communication channels.

Under Celebrants Australia Inc's constitution, each member also consents to Celebrants Australia Inc disclosing the fact of membership to any other person for the purpose of mutual promotion.

GENERAL

Celebrants Australia Inc needs personal information to be able to perform its core functions, including admission to membership, membership administration, professional development (including by the provision of materials), holding networking events, issuing membership certificates, and management of professional conduct. Celebrants Australia Inc holds events to benefit its members.

Celebrant Australia Inc's core services to members include education, training, the provision of information, technical support and advocacy. The main purposes for which we collect, hold, use and disclose personal information are to provide quality services and benefits to our members, to alert them to issues and opportunities in which they might be interested, and to maintain and extend our membership. Committee and members work together with local and other bodies to represent the views and concerns of the profession to governments, regulators, and the general public and through representation on the Coalition of Celebrant Association. Celebrants Australia Inc also interacts with non-members, both prospective members and also the general public. Personal information is collected and used for those processes.

For those above purposes, the Celebrant Australia Inc's activities, include:

Membership management

Managing memberships, for example, by:

- recording and updating membership details and profile information, and maintaining appropriate registers and other records of information relating to Celebrants Australia Inc's corporate governance
- sending notices of Celebrants Australia Inc meetings
- distributing our annual reports

- sending out renewal notices and promotions.

Email communications

As with comparable professional membership organisations, Celebrants Australia Inc communicates frequently with its members and others by email and other means – for example, mobile messaging and the post. The non-members to whom we communicate include students and recently registered celebrants and registered Training Organisations, for the provision of professional development activities. To ensure that our communications are effective, we employ a communications provider, currently it is Samepage via the internet.

Services and publications

- corresponding with members and affiliated persons on issues of mutual interest
- distributing Celebrants Australia Inc publications and newsletters
- the provision of other professional information and materials to Celebrants Australia Inc members and non-members
- organising and holding Celebrants Australia Inc members meetings to consider topics of interest to the profession, and
- providing Celebrants Australia Inc members with access to and information about a range of current and future membership services and benefits.

Education, training and events

- administering Celebrants Australia Inc's Ongoing Professional Development (CPD) program (including informing Celebrants Australia Inc members about CPD requirements, developing, promoting and conducting CPD events for Members and non-members, keeping records of CPD attendance)
- developing, promoting and conducting other Celebrants Australia Inc events (whether digitally, online, face-to-face or otherwise), including seminars and conferences (including organising speakers, locations and catering, making travel arrangements where required and keeping attendance records)
- informing potential Celebrants Australia Inc members and recently registered celebrants about the benefits of membership.

Professional conduct

- ensuring that Celebrants Australia Inc members comply with Celebrants Australia Inc's Constitution, By-Laws, Code of Professional Conduct, and Applicable Regulations;
- investigating and resolving complaints about Celebrants Australia Inc members;
- referring Celebrants Australia Inc members to the Dispute Settlement Centre of Victoria (Department of Justice) for a mediator, if necessary; and
- receiving, investigating and taking action on complaints about non-members (for example, where an individual incorrectly claims to be a Celebrants Australia Inc member).

General administration

- receiving, investigating and taking action on complaints about how the Celebrants Australia Inc has collected or handles personal information;
- recruiting Celebrants Australia Inc staff and contractors;
- processing payments;

- answering queries and resolving complaints; and
- using aggregated information for business analysis.

Other activities

Celebrants Australia Inc may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or:

- which are required or authorised by or under law (including, without limitation, privacy legislation); or
- for which the individual has provided their consent.

The kinds of personal information we collect and hold

GENERAL

The type of personal information that the Celebrants Australia Inc Group collects and holds about you depends on the type of dealings that you have with us. For example, if you:

- join as a member of Celebrants Australia Inc, we collect information including your name, address, contact number, gender, date of birth, address, email address, trading name details, celebrant registration number, and celebrant educational qualifications.
- undertake a Celebrants Australia Inc ongoing professional development program, we collect the same type of information as for Celebrants Australia Inc members, as well as a signature to identify you for registration of your OPD completion.
- contact Celebrants Australia Inc with an enquiry publicly via Samepage, if you do not take advantage of the option to use anonymity or pseudonymity, depending on the nature of the enquiry, we record details about you and relating to the enquiry for all members to view.
- attend a Celebrants Australia Inc meeting, we collect your contact details, address, membership number (if applicable), payment details and any dietary and accessibility requirements (if required).
- are a supplier to Celebrants Australia Inc, we collect contact address details, usually including but not limited to all forms of contact and address, billing information and information about the goods or services you supply.
- are a sponsor of Celebrants Australia Inc, we collect contact address details, usually including but not limited to all forms of contact and address, and information about the sponsorship.
- buy or otherwise obtain professional information and materials from or through Celebrants Australia Inc, we collect contact address details and billing information including credit card or other payment details.
- apply for a job in the Celebrants Australia Inc Group, we collect the information you include in your application for employment, including your cover letter, resume, contact details and referee reports.
- are a member of the general public who contacts Celebrants Australia Inc who elects not to rely on anonymity or pseudonymity, we collect contact address details, usually including but not limited to email addresses and phone numbers and details about the reason for the contact.
- are a recipient of complimentary copies of the Celebrants Australia Inc newsletter, we collect contact address details.

In each case, we seek to keep the personal information we need updated and accurate.

SENSITIVE INFORMATION

Under Australian law, sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection. Sensitive information includes health and genetic information and information about racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record and some types of biometric information.

The Celebrants Australia Inc's policy is only to collect sensitive information where it is reasonably necessary for our functions or activities and either:

- the individual has consented; and
- we are required or authorised by or under law (including applicable privacy legislation) to do so.

- Sensitive health information is only collected with a client's consent.

Our policy is not to use sensitive information except for a purpose which is directly related to the primary purpose for which the information was collected.

COLLECTION OF INFORMATION THROUGH OUR WEBSITE

Cookies

Celebrants Australia Inc uses cookies. A cookie is a small string of information that a website transfers to your browser for identification purposes. Depending on the surrounding circumstances, the cookies used by Celebrants Australia Inc may or may not identify individual users who log into the website. If they do reveal your identity, they constitute personal information, and thus are the subject of the Privacy Act.

Most internet browsers are set to accept cookies. If you prefer not to receive them, you can adjust your internet browser to reject cookies, or to notify you when they are being used.

There are also software products available that can manage cookies for you. Rejecting cookies can, however, limit the functionality of our website (such as preventing users from logging on and making purchases).

WHAT IF YOU DON'T WANT TO PROVIDE YOUR PERSONAL INFORMATION?

Celebrants Australia Inc provides individuals with the option of not identifying themselves publicly by using a generic email address, when dealing with us if it is lawful and practicable to do so.

For example, Celebrants Australia Inc's policy is to enable you to access our website and make general phone and email queries without having to identify yourself.

In some cases however, if you don't provide us with your personal information when requested, we may not be able to respond to your request or provide you with the product or service that you are seeking. For example, you must identify yourself to become a

Celebrants Australia Inc member and, if you are a registered Celebrant, we will check your details at the Australian Government Attorney-General's Department, to confirm that you are the person who is entitled to membership.

How we collect and hold personal information

METHODS OF COLLECTION

Celebrants Australia Inc is required by the Privacy Act to collect personal information only by lawful and fair means. If it is reasonable and practicable, we will collect personal information we require directly from you.

Celebrants Australia Inc collects personal information in a number of ways, including:

- by email
- over the telephone
- through written correspondence (such as letters, faxes and emails)
- on hard copy forms (including event registration forms and surveys)
- in person (for example, at professional development activities)
- through our website (for example, if you make an online purchase or complete and submit a web form such as the update of my profile or a Celebrants Australia Inc membership application form, or if you participate in a live chat)
- at seminars and functions (for example, if you fill out an assessment form or leave us your business card)
- electronic systems such as applications
- from third parties, including:
 - educational providers that assist us in running our educational programs (including organising and conducting events)
 - the Attorney-General's Department or Births Deaths and Marriages Registry, Victoria (for example, through correspondence in relation to conduct of Celebrants Australia Inc members)
 - insurers in relation to professional indemnity insurance

COLLECTION NOTICES

Where Celebrants Australia Inc collects personal information directly from you, Celebrants Australia Inc's policy is to take reasonable steps to notify you, including:

- our identity and how to contact us;
- the purposes for which we are collecting the information;
- whether the collection is required or authorised by or under an Australian law or a court or tribunal order;
- the third parties (or types of third parties) to whom we would normally disclose information of that kind;
- whether any of those third parties are located overseas and, if practicable to specify, the countries in which they are located; and
- the fact that this Privacy Statement contains information about how to access and correct personal information and make privacy complaints (and how we will deal with those complaints).

We do this at or before the time of collection, or as soon as practicable afterwards.

Celebrants Australia Inc will generally include these matters in a collection notice. For example, where personal information is collected on a paper or website form, we will generally include a collection notice, or a clear link to it, on the form.

Collection notices may provide more specific information than this Privacy Statement in relation to particular collections of personal information. The terms of this Privacy Statement are subject to any specific provisions contained in collection notices and in the terms and conditions of particular offers, products and services. We encourage you to read those provisions carefully.

Where Celebrants Australia Inc collects information about you from a third party, our policy is to take reasonable steps to make sure that you are made aware of the collection details listed above and, if you may not be aware that that we have collected the information, of the fact and circumstances of the collection.

UNSOLICITED INFORMATION

Unsolicited personal information is personal information Celebrants Australia Inc receives that we have taken no active steps to collect.

We may keep records of unsolicited personal information if the Privacy Act permits it (for example, if the information is reasonably necessary for one or more of our functions or activities). If not, Celebrants Australia Inc's policy is to destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

Disclosure of personal information to third parties

Under Celebrants Australia Inc's policy, personal information may be disclosed to the following third parties where appropriate for the purposes set out above:

- financial institutions for payment processing;
- insurers;
- persons involved in external dispute resolution involving Celebrants Australia Inc;
- Registered Training Organisations involved with or engaged by Celebrants Australia Inc for the Ongoing Professional Development and other professional programs;
- Celebrants Australia Inc Member Benefits partners and sponsors (so that they can provide members with information about their products and services);
- referees whose details are provided to us by job applicants;
- third parties who have complained about Members (including to advise them of the conduct and outcome of the complaint);
- Celebrants Australia Inc's contracted service providers, including:
 - information technology service providers;
 - publishers of our newsletters, training handbooks and course material;
 - conference organisers;
 - marketing and communications agencies;
 - mailing houses, freight and courier services;
 - printers and distributors of direct marketing material;
 - external business advisers (such as auditors and lawyers); and

- transcript recording service providers, in relation to disciplinary proceedings.
- law enforcement and regulatory bodies as required by law;
- as required or authorised by or under an Australian law or the order of an Australian court or tribunal;
- other professional bodies of which a Celebrants Australia Inc member is also a member in relation to disciplinary proceedings.

In the case of these contracted service providers, Celebrants Australia Inc may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.

Celebrants Australia Inc holds numerous events, such as Celebrants Australia Inc OPD. Third party sponsors and exhibitors may be engaged to help us defray the costs of staging such events. Should Celebrants Australia Inc engage third party sponsors and exhibitors, they commonly conduct competitions and similar activities at those events. Where attendees indicate their consent expressly or by their actions, Celebrants Australia Inc may facilitate the process by which such information as the name, title, and contact details of consenting participants to sponsors and exhibitors for follow up marketing by those sponsors and exhibitors.

Personal information may also be disclosed to third parties with the consent of the member.

Use of government related identifiers

Celebrants Australia Inc's policy is to not:

- use a government related identifier of an individual (such as a Registered Celebrant number) as our own identifier of individuals;
- otherwise use or disclose such a government related identifier; and
- unless this is permitted by the Privacy Act (for example, where the use or disclosure is required or authorised by or under an Australian law or a court or tribunal order).

Data quality and security

GENERAL

Celebrants Australia Inc holds personal information in a number of ways, including in electronic databases, email contact lists, and in paper files held in drawers and cabinets, locked where appropriate. Paper files may also be archived in boxes and stored offsite in secure facilities. Celebrants Australia Inc's policy is to take reasonable steps to:

- make sure that the personal information that we collect, use and disclose is accurate, up to date and complete and (in the case of use and disclosure) relevant; and
- protect the personal information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure.

You can also help us keep your information up to date; by letting us know about any changes to your personal information, such as your email address or phone number. If you

are a member, you can easily review and update your information on an on-going basis, through email to info@celebrantsaustralia.com.au.

SECURITY

The steps we take to secure the personal information we hold include ICT security at the website host (such as firewalls, and anti-virus software protection), secure office access, personnel security and training. The server is also protected via secure firewall.

Payment security

Celebrants Australia Inc processes assessment, membership and other payments using online technologies. Celebrants Australia Inc's policy is to ensure that all transactions processed for Celebrants Australia Inc are made direct by members and potential members and not by Celebrants Australia Inc to ensure payment details are protected.

Website security

While Celebrants Australia Inc strives to protect the personal information and privacy of website users, we cannot guarantee the security of any information that you disclose online: you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact Celebrants Australia Inc by phone or post.

You can also help to protect the privacy of your personal information by keeping passwords secret and by ensuring that you log out of the website when you have finished using it. In addition, if you become aware of any security breach, please let us know as soon as possible.

Third party websites

Links to third party websites that are not operated or controlled by Celebrants Australia Inc are provided for your convenience. Celebrants Australia Inc is not responsible for the privacy or security practices of those websites, which are not covered by this Privacy Statement. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

Access and correction of your personal information

Individuals have a right to request access to the personal information that Celebrants Australia Inc holds about them and to request its correction.

MEMBERS AND PROSPECTIVE MEMBERS

Celebrants Australia Inc members and prospective members can contact our Privacy Officer (details under Further Information below) if you would like to access or correct the personal information that we hold about you. We may ask you to verify your identity before processing any access or correction requests, to ensure that the personal information we hold is properly protected.

Access

Celebrants Australia Inc's policy is to provide you with access to your personal information, subject to some exceptions permitted by law. We may provide access in the manner that you have requested provided it is reasonable and practicable for us to do so.

Correction

If you ask Celebrants Australia Inc to correct personal information that we hold about you, or if we are satisfied that the personal information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, Celebrants Australia Inc's policy is to take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If Celebrants Australia Inc corrects personal information about you, and we have previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask us to notify that other entity. If so, Celebrants Australia Inc's policy is to take reasonable steps to do so, unless this would be impracticable or unlawful.

Timeframe for access and correction requests

Except in the case of more complicated requests, Celebrants Australia Inc will endeavour to respond to access and correction requests within 30 days.

What if we refuse your request for access or correction?

If Celebrants Australia Inc refuses your access or correction request, or if we refuse to give you access in the manner you requested, Celebrants Australia Inc's policy is to provide you with a written notice setting out:

- the reasons for our refusal (except to the extent that it would be unreasonable to do so); and
- available complaint mechanisms.

In addition, if we refuse to correct personal information in the manner you have requested, you may ask us to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, and we will take reasonable steps to associate the statement in such a way that will make it apparent to users of the information.

Complaints

If you have a complaint about how the Celebrants Australia Inc Group has collected or handled your personal information, please contact our Privacy Officer (details under Further Information below).

Our Privacy Officer will endeavour in the first instance to deal with your complaint and take any steps necessary to resolve the matter within one week.

If your complaint can't be resolved at the first instance, we will ask you to provide in writing, details of (for example) the date, time and circumstances of the matter that you are complaining about, how you believe your privacy has been interfered with and how would you like your complaint resolved.

Complaints process

We will endeavour to acknowledge receipt of the Privacy Complaint advice within five business days of receiving it and to complete our investigation into your complaint in a timely manner. This may include, for example, gathering the facts, locating and reviewing relevant documents and speaking to relevant individuals.

In most cases, we expect that complaints will be investigated and a response provided within 30 days of receipt of the Privacy Complaint advice. If the matter is more complex and our investigation may take longer, we will write and let you know, including letting you know when we expect to provide our response.

Our response will set out:

- whether in the Privacy Officer's view there has been a breach of this Privacy Statement or any applicable privacy legislation; and
- what action, if any, Celebrants Australia Inc will take to rectify the situation.

If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commissioner, as follows:

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Address: GPO Box 5218
Sydney NSW 2001

or, in some instances, the Marriage Law and Celebrants Section, Australian Government Attorney-General's Department, as follows:

Telephone: 1800 550 343

Fax: 02 6141 3246

Email: marriagecelebrantssection@ag.gov.au

Address: 3-5 National Circuit
Barton ACT 2600

Retention of personal data

All personal data that has been collected from you by Celebrants Australia Inc will only be kept for a limited duration that is relevant to the purpose for which your personal data is to be used and for as long as required by applicable law.

Further information

Please contact Celebrants Australia Inc if you have any queries about the personal information that we hold about you or the way we handle that personal information. Our contact details for privacy queries and complaints are set out below.

Privacy Officer (Secretary)
Celebrants Australia Inc
Telephone: 0411 175 208
Email: info@celebrantsaustralia.com.au
Address: 9 Sugargum Way
Sunbury Vic 3429

Changes to this policy

We may amend this Privacy Statement from time to time. The current version will be posted on our website and a copy may be obtained free of charge from our Privacy Officer.

Disclaimer

This Statement is provided for the purposes of information only. While we have taken care to ensure that it is accurate and current, we provide no guarantee as to its accuracy or currency. We accept no liability for loss or damage suffered as a result of reliance on the information provided in this Statement.