

PRIVACY POLICY

True North Church Inc, Whitfords Church of Christ Inc

(Collectively referred to as True North, we, our, us)

True North recognises the importance of protecting individuals' privacy and rights regarding personal information. This Policy details how personal information is collected and managed. True North is committed to rights established under the Privacy Act 1988 (Cth) (Act) and will comply with all of the Act's requirements regarding the collection, management, and disclosure of personal information.

PERSONAL INFORMATION DO WE COLLECT AND HOLD

True North may collect the following types of personal information:

- contact information
- date and place of birth
- attendees details
- employment details, including tax file numbers
- health information
- volunteer details
- expertise and interests
- family circumstances
- financial information provided to True North, including credit card and debit card details
- sensitive information (such as health, family and personal circumstances, criminal records check) that is provided, including but not limited to information shared during pastoral visits, prayer and when completing our forms
- personal and family Income levels, Centrelink card number and other information that are necessary to the delivery of community relief services
- details of events or camps, together with any additional information necessary to run events or camps
- any direct or indirect personal information provided through the use of our websites or online presence
- any other information provided.

True North may collect health and sensitive information when our pastoral and support teams provide pastoral care or community services support. True North will only collect the sensitive information necessary to provide relevant care and services.

True North may also collect non-personal information. For example, we may periodically conduct anonymous online surveys with our congregation, volunteers or clients.

COLLECTION OF PERSONAL INFORMATION

True North will always collect personal information directly from individuals unless it's not possible or practical to do so. We may collect information from individuals through the following:

- forms (complete paper and electronic forms, including but not limited to event and course registrations;
- financial information collected via giving envelopes and electronic means, including but not limited to our website, phone call and post;
- on sign up to use Planning Center Online via the Church Center mobile app;
- subscribing to True North communications via Mailchimp (or similar);
- SMS communications;
- access and use of our website to register, give online or inquire;
- posting comments on our social media, including but not limited to X, Instagram, Vimeo, YouTube and Facebook;
- access of services, events and programs;
- email or telephone;
- website;
- voluntary provision of details to our mailing lists;
- conversations or prayer sessions, in person or on the telephone, between individuals and our staff members and volunteers;
- interviews, meetings and discussions, formal and informal, with our staff members and volunteers;
- attendance at our weekend gatherings, events, camps, courses and our other programs.

True North may also collect personal information from third parties, including:

- Australian Federal Police or WA Police regarding police checks that are required for volunteering or working with us in particular areas;

- Department of Child Protection regarding Working with Children Checks that are required for volunteering volunteer or work with us in particular areas; and
- any other agencies and other government entities as and when required.

If it is unclear whether an individual has agreed to provide us with personal information, we will make reasonable efforts to contact persons and ensure that they are informed about the collection and the purposes for which we gathered it.

True North may also collect personal information about someone else from individuals; however, this information can only be disclosed as authorised. True North will do our best to ensure that the individual knows and agrees to the details outlined in this privacy policy. This involves notifying them that we are gathering their personal data, explaining the purpose behind collecting the data, specifying who will have access to it, outlining the individual's entitlement to access their data, sharing our identity, and providing our contact information. If requested, a disclosure of information must assist with any individual's requests to access or update the personal information collected from them.

In some cases, True North may collect personal information through cookies. When individuals browse our site, their computer may receive a "cookie" (a small summary file with a unique ID number). This allows us to recognise your device and welcome you each time you visit our website without the need for you to register. We use cookies to analyse traffic patterns, track visited areas and measure transaction patterns. We use this information to research our users' patterns so that we can improve your online experience. Our cookies don't gather personal information. Individuals who don't wish to receive any cookies can set browser settings to decline them. We may log your device IP address for trend analysis, website administration, user movement tracking, and the collection of general demographic data.

True North may receive unsolicited personal information where we did not request for the information. Unsolicited personal information includes misdirected mail received, correspondence sent to us by the public, employment and volunteer applications sent on an individual's own initiative and not in response to our advertised vacancy and promotional flyers containing personal information and comments on our social media. We reserve the right to assess all unsolicited personal information received and to de-identify or destroy it within a reasonable period, according to the Australian Privacy Principle 4.

WHAT HAPPENS IF WE CAN'T COLLECT PERSONAL INFORMATION?

Individuals who opt not to provide True North with requested personal information may lead to some or all of the following:

- We may not be able to provide the requested services, either to the same standard or at all;
- We may not be able to provide information about services that a person may want (for example, events, weekend gatherings, guest speakers, upcoming events);

- We may be unable to customise our web content according to an individual's preferences, making their experience less enjoyable.

There are times where an individual may exercise their right not to identify themselves or they may choose to use a pseudonym when contacting True North. For example, to request prayer for an individual or someone associated with the individual, the right to anonymity or to use a pseudonym will be decided on a case-by-case basis under Australian Privacy Principle 2.

FOR WHAT PURPOSES DO WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION?

True North collects personal information so that invitations for gatherings and events can be sent to people who identify as a part of the True North community.

True North collects personal information to assist you within our community services area. We also collect personal information about to communicate the impact and field trips we organise to developing countries as part of our missions area.

Personal information is collected, stored, used and shared for the following purposes:

- to offer services and communications;
- to answer enquiries, provide information or advice about existing and new services, events and programs, giving or other donations;
- to assist in the coordination of volunteering, community fundraising and other programs;
- to process giving, donations, event registrations and other payments and to provide the relevant receipts;
- to communicate about how giving and donations are used;
- to provide access to Planning Center Online via the Church Center mobile app;
- to provide access to our websites;
- to evaluate the performance and improve the operation of our websites;
- to provide opportunities to gather opinions through surveys relating to True North community activities, including weekend gatherings;
- for the administrative, planning and guest service improvements of True North, our contractors or service providers;
- to keep contact information relevant;
- to report to the government and other funding providers about how the funds are used;
- to process and respond to any complaints;

- to observe all applicable laws, rules, and regulations, as well as any valid determinations, decisions, or directives from regulatory bodies, or cooperate with governmental authorities at the national or local levels as required.

True North may use personal information for other specific purposes for which it was requested and which is advised prior to collection.

True North will not disclose, share, trade, or lease personal information except as explicitly stated in this Privacy Policy.

True North may access, aggregate and use non-personally identifiable data that we collect. This data will in no way identify individuals. We may use this data to:

- help us to understand better our congregation's responses to our weekend gatherings (including the number of attendees);
- assist us in better understanding how our community services clients use our programs;
- provide people with further information and updates on our weekend gatherings, events and programs;
- improve our weekend gatherings, events and programs.

TO WHOM MAY WE DISCLOSE INFORMATION?

We may disclose personal information to:

- employees, volunteers (to a certain extent), and service providers in order to operate our website, respond to requests, and to provide services. This may include web hosting providers, IT system administrators, couriers, payment processors, electronic network administrators, debt collectors, and professionals such as accountants, solicitors, and consultants;
- suppliers and other third parties with whom we have business relationships, such as our financial institutions;
- any organisation for any authorised purpose with your express consent.

DIRECT MARKETING MATERIALS

True North may send information about weekend gatherings and events that may be of interest. Details can be transmitted through different channels, such as postal mail, SMS, and email, in compliance with existing marketing regulations (e.g., the Spam Act 2003 (Cth)). True North will use preferred methods of communication where possible. In addition, people may opt out of receiving information from us at any time by using the opt-out function provided in the method of communication used or by contacting us directly

(see the details below). We will ensure that contact is removed from our mailing list. We do not share personal information with other organisations for marketing purposes.

ACCESSING AND CORRECTING PERSONAL INFORMATION

People may access any personal information we hold by updating details on Planning Center Online (PCO). PCO is our web-based church management software. It is the individual's responsibility to keep their PCO password secure. If individual's suspect or notice any misuse of their password, they must report this to True North as soon as possible and immediately change their password within PCO or via the Forgot username or password process on PCO. Alternatively, individuals may request access to any personal information we hold by contacting us directly (by telephone, at our Information Hub at our weekend gathering, at our Church reception during the week) or to the contact provided below. Where we store personal information that individuals have the right to access, we will make every effort to provide suitable means of access, such as by mail or email. True North will not charge you any fees for providing information or correcting personal information.

There may be situations where True North cannot grant access to stored personal information. For instance, we may refuse a request for access if it intrudes into someone else's privacy, or it leads to a breach of confidentiality. In this situation, we will provide you with a written refusal stating the reasons. Individuals may request to amend their personal information if there is a belief that the information we hold is incorrect, incomplete or inaccurate. If we do not agree that there are reasons for the amendment, we will include a note to a person's personal information registering their disagreement.

Personal information is retained for as long as we need it to provide information and services. However, we may also be required to keep some of your personal information for specified periods of time pursuant to specific laws relating to companies, not-for-profit organisations and financial reporting legislation.

PROCESS FOR COMPLAINING ABOUT A BREACH OF PRIVACY

Where an individual believes that their privacy is violated, they may email their complaint to reception@truenorthchurch.com.au and include a written description of what happened. Once we have all the information, we will investigate and take the necessary steps. True North will endeavour to respond to all complaints within 28 days. Any dissatisfaction with True North's response to a complaint can be directed to the Australian Information Commissioner (www.oaic.gov.au).

DISCLOSURE OF PERSONAL INFORMATION TO ANYONE OUTSIDE AUSTRALIA

True North may disclose personal information to service providers located overseas for some of the abovementioned purposes. We take measures to ensure that the overseas recipients of personal information adhere to the privacy obligations associated with data. We disclose personal information to our data hosting

service providers outside Australia, including America, New Zealand and the European Union. Our data hosting service providers may store data in several other countries.

STORAGE AND SECURITY

True North will take reasonable steps to ascertain that personal information is protected from abuse, loss, unauthorised access, modification or disclosure. We may store your information in either electronic or hard copy form. Personal information is stored on secure servers with SSL Certificates issued by leading certificate authorities such as Go Daddy and Let's Encrypt. All information transferred between True North and individuals is encrypted. The secure servers are located in Australia. We also utilise an email filtering host using third-party provider Microsoft.

True North does not retain credit card information, and our employees have no access to it. All credit card information is encrypted and stored securely by the respective payment gateways (Tithe.ly or Stripe) to enable us to process credit cards on a recurring basis automatically. Individuals should review Stripe's or Tithe. Ly's Privacy Policy to ensure that they are satisfied with it. Only authorised staff members can access credit card and debit card details, and they ensure that these details are de-identified upon processing.

Personal information is collected and stored in our church management system (PCO), which is maintained by cloud-hosting service providers. Hardcopy information is stored securely in our offices to prevent entry by unauthorised persons. All personal information that is not active is archived with a third-party provider of secure archiving services. We take reasonable steps to ensure that the third-party provider maintains the security of the information. Personal information remains on our church management system, PCO, until we are advised that an individual would like it removed or if we destroy, delete or de-identify it according to privacy law principles.

Since our website is connected to the internet, which is inherently insecure, we cannot assure the security of the information sent to us online. We cannot guarantee that the information transmitted by individuals will remain secure during internet transmission. Therefore, any personal or proprietary data conveyed to us online is at the individual's own risk. In the event of discovering or being informed of a breach in security resulting in unauthorised access, use, disclosure, copying, alteration, or disposal of personal information, we will promptly notify individuals at the first reasonable opportunity.

We take particular care when dealing with health and sensitive personal information, collecting only the necessary information for us to provide the services that individuals access. We take reasonable steps to protect personal information, including ensuring that access to this information is restricted to specific staff members. We also take measures to destroy or de-identify personal information when it is no longer necessary for the purpose for which it was collected.

LINKS

Our website may link to third-party websites. We do not make any representations or warranties regarding the privacy practices of these third-party websites, and we do not assume responsibility for their privacy policies or content. It is the obligation of third-party websites to provide information regarding their privacy practices.

CONTACTING US

Enquiries pertaining to this privacy policy, including concerns or complaints about the handling of privacy, or suspected breaches of privacy can be directed to provided contact details below. Feedback is important to True North. True North will handle requests or complaints with the strictest confidentiality. A designated representative will contact an individual lodging a complaint or concern within a reasonable timeframe subsequent to the receipt of a written complaint and any requested information in order to address concerns and present potential resolutions. Our objective is to ensure that complaints are addressed promptly and suitably. For all privacy concerns, please contact our leadership team at:

True North Church Post: 19 Scaphella Avenue, Mullaloo WA 6027

Tel: (08) 9403 1800

Email: reception@truenorthchurch.com.au

CHANGES TO OUR PRIVACY POLICY

True North may revise this policy from periodically or when required.

This policy was last updated on 01 July 2025.