



Version No.	Version 1.0
Last Revised	25 March 2025
Effective Date	25 March 2025
Responsible Person	The Board

PRIVACY POLICY

For the purpose of this policy:

- ‘CRSF’ means the Cambodia Rural Students Foundation.
- ‘CRST means the Cambodia Rural Students Trust.

This policy outlines the CRSF commitment to ensuring the safety and protection of all children to ensure that all children in its care are safe from harm and abuse regardless of the child’s race, religion, indigeneity, disability, age, displacement, caste, gender, gender identity, sexuality, sexual orientation, poverty, class or socio-economic status.

1. COVERAGE

Unless the context otherwise applies, this policy applies to the CRSF Board and its directors, team members, advisors and mentors, the CRST management team and leadership team, all teachers, all CRSF and CRST volunteers, guests and visitors, all CRST students and all children and young people involved in CRST activities.

2. PURPOSE

The purpose of this document is to provide a framework for CRSF in handling personal information in all its activities and operations.

3. GUIDING PRINCIPLES

Principles of respect, integrity, professionalism, privacy and impartiality should be observed by CRSF team members when dealing with any communications.

4. DEFINITIONS

Partners are individuals, groups of people or organisations that collaborate with or are contracted by CRSF to achieve mutually agreed objectives in development activities.

Personal information is information which directly or indirectly identifies a person. The types of personal information we collect may include your name, date of birth, gender, contact information, image, credit/debit card information and other information about your history with or relationship to CRSF.

Volunteers include persons undertaking an activity overseas or participating in professional development in their own country or overseas for the common good and without financial gain.

5. POLICY

CRSF collects and administers a range of personal information for the purposes of project implementation, fundraising and membership management and marketing. The CRSF is committed to protecting the privacy of personal information it collects, holds and administers.

CRSF recognises the essential right of individuals to have their information administered in ways which

they would reasonably expect - protected on one hand and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in this Privacy Policy, which is compliant with the *Privacy Act 1988* (Cth).

CRSF is bound by laws which impose specific obligations when it comes to handling information. CRSF has adopted the following principles contained as minimum standards in relation to handling personal information.

If an individual wishes to make a complaint about a breach of this privacy policy or any of the privacy principles in the *Privacy Act 1988*, you can contact the CRSF Privacy Officers via email to:

- Aviv Palti: aviv.palti@lifestyleb.com
- Jessica Palti: jessica.palti@lifestyleb.com

Sufficient details and information regarding your complaint and any supporting evidence should be included.

Collection of information

CRSF will:

- Only collect information that is necessary for the performance and primary function of CRSF.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others).
- Determine, where unsolicited information is received, whether the personal information could have been collected in the usual way, and then if it could have, treat it normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

Use and Disclosure

CRSF will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, CRSF will obtain consent from the affected person.
- In relation to a secondary purpose, CRSF will only use or disclose the personal information where:
 - o a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
 - o the person has consented; or

- o certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose and has consented, and CRSF has provided an opt out and the opt out has not been taken up.
- In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- State whether the information is sent overseas and will ensure that any overseas providers of services are as compliant with privacy as CRSF is required to be.
- Provide all individuals with access to personal information except where it is a threat to life or health or it is authorised by law to refuse and, if a person is able to establish that the personal information is not accurate, then CRSF must take steps to correct it. CRSF may allow a person to attach a statement to their information if CRSF disagrees it is inaccurate.
- Where for a legal or other reasons we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.
- Not sell, rent, or lease any individual's personal information or lists of email addresses to anyone for marketing purposes, and we take commercially reasonable steps to maintain the security of this information.

Storage

CRSF will:

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or disclosure.
- Before CRSF discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. CRSF will have systems which provide sufficient security.
- Ensure that CRSF's data is up to date, accurate and complete.

Destruction and de-identification

CRSF will:

- Destroy personal information once it is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information CRSF holds and will not use any government related identifiers unless they are reasonably necessary for our functions.

Data Quality

CRSF will:

- Take reasonable steps to ensure the information CRSF collects is accurate, complete, up to date, and relevant to the functions we perform.

Openness

CRSF will:

- Ensure stakeholders are aware of CRSF's Privacy Policy and its purpose.
- Make this information freely available in relevant publications and on CRSF's website.

Access and Correction

CRSF will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

Anonymity

CRSF will:

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

Making information available to other organisations

CRSF will:

- Release information to third parties only when it is requested by the person concerned.

Responsibilities

CRSF's Board and directors are responsible for developing, adopting, and reviewing this policy.

The CRSF Board, is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

Where compliance issues are identified, the CRSF Board will work relevant stakeholders to address these issues promptly. The policy will be reviewed every three years and revised as needed, with the approval of the Board.

Legislative Framework and Standards

CRSF also adheres to the following Australian legislation:

- The Australian Privacy Act 1988
- Australian Privacy Principles
- Payment Card Industry Data Security Standard