



WE ARE MOBILISE DATA & PRIVACY POLICY



VERSION	DATE	CHANGES	AUTHOR	APPROVER
1	APRIL 2023	ORIGINAL DEVELOPMENT	RHYANNON SMITH	DANIELLE SCHUTTE
2	SEPTEMBER 2024	IMPROVED SPECIFICITY THROUGHOUT ACCORDING TO APPS	DANIELLE SCHUTTE	DANIELLE SCHUTTE

1. SCOPE

We Are Mobilise develops innovative solutions for people facing homelessness. Key activities cover education and advocacy campaigns, direct giving programmes, and Outreach to provide social connection to people sleeping rough. As part of these activities, we collect, manage and store specific data from key partners, staff, volunteers, donors and participants. As a not-for-profit organisation, we also fundraise, employ staff, report to stakeholders, collect and reflect on feedback and generate awareness of our mission and activities via marketing tools - all of which entails collecting and managing data.

This policy applies to all functions of We Are Mobilise in how data is collected and managed. This is in accordance with the Privacy Act 1988 (Cth) ('Privacy Act') and Australian Privacy Principles ('APPs').

2. COLLECTION OF INFORMATION

2.1. Types of data collected

We Are Mobilise collects the following personal information, in addition to any other information relevant to the operations of the charity:

- First & surname;
- Forms of identification (i.e. driver's licence);
- Age and date of birth;
- Email addresses and phone numbers;
- Residential or workplace addresses;
- Bank account or credit card details;
- Signatures;
- Employment details;
- Purchase or donation amount and activity;
- Program participant history;
- Feedback and testimonials from stakeholders.

Administrative information we collect includes:

- Digital and in-person interactions with our website/s, social media and other media content;
- Attendance at any events we run;
- Details regarding the type, duration, value and quantity of support we provided to participants.

2.2. Consent from users to collect and share their personal information

In accordance with obligations under the Privacy Act & APPs, We Are Mobilise requests consent from any user or participant prior to collecting personal information. In each case, We Are Mobilise will provide access to this Data and Privacy Policy & confirm they have read and understood the implications of this policy. The user will signify that they have read and understood this policy by ticking a box or providing verbal agreement. In doing so, the user provides consent to having their personal information collected. Mobilise will seek explicit consent from individuals before collecting sensitive information or sharing data with third parties. Consent is confirmed via a checkbox or verbal agreement where users acknowledge their understanding of how their data will be used. This information will be handled and managed appropriately and in accordance with this policy document.

2.3. How data is collected

We Are Mobilise may collect personal information in the following ways:

- Via secure online portals that are password secured. All credentials required to access these portals are held in encrypted and secure password generation and storage systems;
- In written form, digitally or physically;
- Verbally, in person and over the phone;
- Via third parties, such as charities referring people to our programs or marketing agencies, which are bound also by the Privacy Act.

2.4. Data management & storage

We Are Mobilise may manage and store personal information as per the following:

- Identifiable and sensitive personal information is currently held in a Customer Relationship Management (CRM) platform called Salesforce, and in the shared Google Drive storage for We Are Mobilise. Data which We Are Mobilise considers sensitive or personal is held in Google Drives with access limited to We Are Mobilise Directors and key, responsible personnel. You can access Salesforce's data integrity systems [here](#).
- Mobilise uses software providers based in the United States and European Union to store personal information. We ensure compliance with APP 8 by entering into contractual arrangements with these providers, ensuring they adhere to Australian privacy standards and that your data is protected.
- Program evaluation and reporting is necessary to assess the effectiveness of the program and allow for ongoing improvements. We Are Mobilise may elect or employ third party organisations to conduct program evaluations. Prior to this partnership, We Are Mobilise determines the data integrity systems that the organisation has in place during our due diligence process. We Are Mobilise can be contacted for the relevant organisations' data and privacy policy.

- Mobilise may link personal information collected from different engagements (e.g., volunteering, donations) to assess the overall impact of our programs. This is done in accordance with APP 6, and personal data is only used for purposes directly related to our mission of supporting people experiencing homelessness.
- We Are Mobilise will destroy or de-identify your personal information when we no longer need it for the purpose for which it was collected, unless Federal or State law requires otherwise.

2.5. Collection of unsolicited information

Unsolicited information is defined as any identifiable information that is collected without defined consent or solicitation. We Are Mobilise request consent and define what information is required prior to collecting any personal information. This is outlined in section 2.2 of this policy document. In the unlikely event that information outside of the defined scope is collected, We Are Mobilise will destroy said information or de-identify the information as soon as practically possible.

3. DISCLOSURE

We Are Mobilise works with a range of partner organisations, for instance, when conducting joint outreach activities, linking people experiencing homelessness with employment or other relevant opportunities, and in transferring cash payments to individuals through third-party financial services.

We Are Mobilise use and disclose personal information as required by normal course of business, but only where relevant and necessary. This is in strict accordance with the APPs. Where information is shared or published publicly, information will be deidentified unless explicit written consent is obtained, either verbally or in writing from the subject of the material. Mobilise may share personal or sensitive information with third-party providers to enhance the effectiveness of our programs and other key business activities. All third parties must sign a non-disclosure agreement, code of conduct or contract with Mobilise and comply with our privacy and data security standards. Information is only shared when necessary to increase the benefit of our key activities for people facing homelessness.

4. RIGHTS & CHOICES WHEN PROVIDING PERSONAL INFO

All individuals who provide personal information to We Are Mobilise have the right to:

- Ascertain what data is being held by We Are Mobilise by written request via the information provided in Contact Details (section 7);
- Request for any personal information that has been previously collected, be updated by written request via the information provided in Contact details (section 5); and
- Remain anonymous or use pseudonyms where practical, particularly when providing feedback or making donations.

5. NOTIFICATION OF DATA BREACHES

In accordance with the Privacy Act, individuals will be notified where possible in the unlikely case of any lost, inappropriate disclosure of, improper access to or major breach in personal data management systems. In the event of a data breach, Mobilise will notify affected individuals within 30 days, outlining the nature of the breach, the personal information involved, and steps taken to mitigate any harm.

6. MAKE A COMPLAINT

If there is concern around how We Are Mobilise is collecting, managing or storing personal information, a complaint can be made. This is to be in writing to the contact details provided (section 7). If We Are Mobilise's response is deemed unsatisfactory, further action can be requested via the [Office of the Australian Information Commissioner](#).

7. CONTACT DETAILS

For further information around We Are Mobilise's collection and management of data and personal information, you can contact us via the following:



info@wearemobilise.com



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