

Privacy Policy

Policy number	TP007	Version	1.0
Drafted by	Ninos Hozaya	Approved by Board on	02/02/2026

1. Purpose

- 1.1. This Tawasul Foundation Incorporated ("the Association", "we", "us", or "our") is a charitable, refugee-led organisation established to relieve the distress, helplessness, suffering, and misfortune experienced by refugees, newcomers, and culturally and linguistically diverse (CALD) communities in Australia.
- 1.2. We are committed to protecting the privacy, confidentiality, and personal information of our members, donors, service users, staff, and community participants.
- 1.3. This Privacy Policy outlines how we collect, use, hold, disclose, and manage personal information in compliance with our Constitution, the Associations Incorporation Reform Act 2012 (Vic), the Privacy Act 1988 (Cth), and the Australian Privacy Principles (APPs). This Policy applies to all members, Board members, volunteers, employees, contractors, and individuals interacting with the Association.

2. Types of Personal Information we Collect

Depending on your relationship with Tawasul Foundation Inc., we may collect and hold the following personal information:

- 2.1. Membership Information: In accordance with Rule 18 of our Constitution, we maintain an official Register of Members containing:
 - 2.1.1. Full name
 - 2.1.2. Residential or postal address for service of notices
 - 2.1.3. Email address
 - 2.1.4. Date on which membership commenced (and date membership ceased, if applicable)

- 2.1.5. Membership category (e.g., standard member, associate member under 15 years of age)
- 2.1.6. Payment records for joining fees and annual subscriptions
- 2.2. Board Members and Governance Personnel: Under Rule 49 of our Constitution, individuals appointed or elected to the Board must submit written consent forms containing:
 - 2.2.1. Full name, date of birth, and residential address
 - 2.2.2. Signed consent and acknowledgment of duties under the Act and Constitution
 - 2.2.3. Disclosures of material personal interests / conflicts of interest (pursuant to Rule 65)
- 2.3. 2.3 Donors and Supporters
 - 2.3.1. Name, contact details, and payment/banking information (for processing donations to the Association's Gift Fund established under Rule 76)
 - 2.3.2. Tax receipt records
- 2.4. Service Users, Program Participants, and Clients
 - 2.4.1. Name, contact details, demographic information, language spoken, and settlement needs necessary to deliver targeted relief, integration, and wellbeing services in furtherance of our charitable purposes.
 - 2.4.2. Sensitive Information: In limited circumstances (and with explicit consent), we may collect sensitive information such as cultural/ethnic background or health/support requirements where directly necessary to provide tailored relief programs.

3. How we Collect Information

We collect personal information directly from you through fair and lawful means, including when you:

- 3.1. Submit a written membership application (pursuant to Rule 9);
- 3.2. Nominate or accept appointment for a Board or subcommittee position;

- 3.3. Make a gift or donation to the Gift Fund;
- 3.4. Enrol in or access our community support services, programs, or events;
- 3.5. Communicate with us via email, mail, phone, or website inquiries

4. How we Collect Information

We collect, hold, and use personal information strictly to fulfill our charitable purposes and legal obligations, including:

- 4.1. Governance & Legal Compliance: Maintaining the statutory Register of Members, issuing notices of General Meetings, tracking subscriptions, managing Board elections, and lodging required reports with Consumer Affairs Victoria / Registrar of Incorporated Associations.
- 4.2. Service Delivery: Delivering relief, settlement assistance, and wellbeing programs to refugees, newcomers, and CALD communities.
- 4.3. Financial Administration: Processing donations, issuing tax-deductible receipts through our Gift Fund, and maintaining financial records for 7 years as required under Rule 70.
- 4.4. Communication: Keeping members and supporters informed about organizational activities, meetings, and initiatives.

5. Member Register and Inspection Rights

- 5.1. Statutory Rights and Obligations: Under Rule 18(2) and Rule 75(1) of the Constitution, members have a statutory right to inspect the Register of Members free of charge at reasonable times.
- 5.2. Privacy Protections for Members
 - 5.2.1. Restricted Access: In accordance with Section 59 of the Associations Incorporation Reform Act 2012 (Vic) and Rule 18 Note, access to the personal information of a member recorded in the Register may be restricted if there are special circumstances (such as safety risks or risk of harassment).

5.2.2. Prohibition on Improper Use: Pursuant to Section 58 of the Act, it is a legal offence to make improper use of information obtained from the Register of Members. Members who inspect the Register must not use the contact information of other members for commercial, advertising, political, or improper purposes.

6. Disclosure and Sharing of Personal Information

Tawasul Foundation Inc. does not sell, rent, or trade personal information to third parties. We may disclose personal information only in the following circumstances:

- 6.1. Regulatory Reporting: To the Registrar of Incorporated Associations, Australian Charities and Not-for-profits Commission (ACNC), or Australian Taxation Office (ATO) as required by law.
- 6.2. Delegated Functionaries: To Board members, subcommittees, or staff delegated by the Board to conduct specified functions (under Rule 43).
- 6.3. Third-Party Service Providers: To trusted software, database, and financial institutions (e.g., banking portals for donation processing) under strict confidentiality arrangements.
- 6.4. Legal Requirements: Where required or authorised by law, or to protect against safety threats.

7. Data Storage and Security

We take all reasonable steps to safeguard personal information against loss, misuse, unauthorised access, modification, or disclosure:

- 7.1. Physical Security: Paper records, seal, and physical books are kept securely under the custody of the Secretary and Treasurer (pursuant to Rules 47, 48, and 75).

- 7.2. Electronic Security: Digital records, financial data, and member registers are secured with access controls, standard encryption, and password management.
- 7.3. Retention: Financial records are retained securely for a minimum of 7 years in accordance with Rule 70(2). Former members' records are archived in the Register as required by Rule 18(1)(b).

8. Access to and Correction of Personal Information

- 8.1. Inspection of Books and Records: Under Rule 75 of the Constitution, current members may request to inspect:
- 8.1.1. The Register of Members
 - 8.1.2. Minutes of General Meetings
 - 8.1.3. Financial statements, books, and relevant documents
 - 8.1.4. Refusal Grounds: Pursuant to Rule 75(2), the Board reserves the right to refuse inspection of records relating to confidential, personal, employment, commercial, or legal matters, or where inspection may be prejudicial to the interests of the Association.
- 8.2. 8.2 Updating Personal Information: Members and individuals may request access to or correction of their personal information held by us at any time by contacting the Secretary.

9. Grievances and Privacy Complaints

If you believe Tawasul Foundation Inc. has breached your privacy or mishandled your personal data:

- 9.1. Direct Resolution: You may submit a written complaint to the Secretary at the registered address or official email.
- 9.2. Grievance Procedure: Dispute and grievance procedures set out under Part 3 (Division 3, Rules 25–29) of the Constitution apply to disputes between

members, the Board, or the Association. We will attempt to resolve the matter directly within 14 days or through mediation.

9.3. External Complaints: If you remain unsatisfied, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) or Consumer Affairs Victoria.

10. Changes to this Privacy Policy

The Board may review and update this Privacy Policy from time to time to ensure compliance with legal obligations and organizational growth. The latest version will always be made available to members and the public upon request.

11. Contact Details

To update your details, request access to records, or make a privacy inquiry, please contact:

The Secretary, Tawasul Foundation Incorporated
Email: secretary@tawasul.org.au