



The Hunger Project Australia

PRIVACY POLICY

Policy Name	THPA Privacy Policy
Policy Owner	THPA Risk, Compliance and Operations Manager
Approved By	THPA National Board
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1. PURPOSE

The Hunger Project Australia (THPA), is committed to managing personal information in accordance with the Privacy Act 1988 (Cth) (Privacy Act), the Australian Privacy Principles (APPs), and reflects THPA's commitment to the ACFID Code of Conduct, including Commitment 7.2.2.

This Privacy Policy explains how we collect, use, disclose and hold personal information and how to contact us if you have any queries about personal information that we hold about you.

2. SCOPE

This policy applies to:

- all personal information collected, used, disclosed or held by The Hunger Project Australia;
- all employees, interns, volunteers, contractors, and Board or Committee members of The Hunger Project Australia;
- all individuals whose personal information we collect, including donors, program participants, event attendees, website visitors, job applicants, and other stakeholders.

This policy applies to personal collected through all channels, including our website, social media, email, telephone, mail, and in-person interactions.

3. KEY TERMS

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not. Examples include an individual's name, address, contact number and email address.

Sensitive information is a subset of personal information that includes information about an individual's 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 orientation or practices, criminal record, health information, genetic information, or biometric information.

Australian Privacy Principles (APPs) are the 13 principles set out in Schedule 1 of the Privacy Act 1988 (Cth) that regulate how organisations collect, use, disclose and store personal information, and how individuals can access and correct personal information held about them.

4. PERSONAL INFORMATION COLLECTED

The kinds of personal information we collect will depend on the nature of our relationship with you. Generally, the personal information we collect from you may include:

- **Identity data** which may include your name, title, date of birth and gender.
- **Contact data** which may include your address, email address and telephone numbers.
- **Financial data** which may include your bank account and credit card details. We will follow our PCI Compliance Procedure in the management of credit card data.
- **Transaction data** which may include details about payments between us and other details of purchases or donations made by you.
- **Technical data** which may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- **Profile data** which may include your username and password, purchases or orders, your interests, preferences, feedback and survey responses.
- **Usage data** which may include information about how you use our website services.
- **Marketing and communications data** which may include your preferences in receiving marketing communications from us and your communication preferences.

You do not have to provide us with personal information. However, if you do not provide your personal information, or provide us with anonymous, inaccurate or incomplete information we may not be able to provide you with the information and services you require.

We do not collect personal information from individuals under 18 years of age without parental or guardian consent. If we become aware that we have collected personal

information from a person under 18 without appropriate consent, we will take steps to delete that information promptly.

5. HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information in a variety of ways, including directly from you when you communicate with us by post, over the phone, by email, over the internet via our website or social media pages or in person. We will notify you about the collection of your personal information at or before the time we collect it, or if that is not practicable, as soon as practicable after collection. For example, when you:

- make a donation via our website;
- attend one of our events;
- subscribe or sign up via one of our microsites, such as The End of Financial Year Campaign;
- subscribe to our communications or publications;
- request resources or marketing be sent to you; or
- give us feedback.

We may also receive personal information about you from other sources, for example:

- third-party suppliers and contractors who assist us with our operations, including:
 - donation and fundraising platforms, such as Raisely and Fundraisin;
 - events and ticketing platforms, such as Eventbrite and Humanitix;
 - analytics providers, such as Google Analytics;
- advertising networks;
- technical, payment and delivery providers; and
- other The Hunger Project offices.

6. COOKIES AND THE USE OF OUR WEBSITE

We use cookies on certain web pages of our website to help improve the user experience. Cookies allow our website to remember certain information that will make your visit to the website more useful, such as:

- your browser type;
- your approximate location (city, state, country);
- your IP address;
- information about when and how you use our website;
- information about your past internet usage, such as websites you visit before coming to our website.

Cookies store information about matters such as your preferences on our Website. This allows our Website to be tailored to you for any of your return visits. Most cookies will not be used to identify you personally, although some analytics cookies may collect information that could be used to identify you when combined with other data.

If you would prefer not to receive cookies, you can alter your security settings on your web browser to disable cookies or to warn you when cookies are being used. However, by disabling the cookie function in your web browser you may impede your ability to use parts of the website.

Our websites may contain links to third party websites. We are not responsible for the content, claims of offer or privacy practices of websites that are linked to our website. We recommend that you review the privacy policies of each website you visit.

7. WHY WE COLLECT AND USE YOUR PERSONAL INFORMATION

We collect and use your personal information for a range of purposes, including:

- to provide you with information or services that you have requested from us;
- to provide programs and other services to you;
- to provide you with information about our work or our activities;
- to process donations and provide receipts;
- to fundraise in accordance with our internal policies and procedures;
- for administrative purposes and internal record keeping purposes;
- to contact you where you have been identified as a contact person for an organisation, such as a foundation (if we obtain your contact details in this way, we will only use them to contact you in your capacity as a representative of that organisation);

- to analyse and improve the content and operation of our website;
- to analyse and improve our internal business processes.

We will only use your personal information for the purposes described in this policy. We may also use and disclose your personal information for other purposes required or permitted by law (including purposes for which you provide your consent).

8. DIRECT MARKETING

We may use or disclose your personal information for the purpose of informing you about our services, programs, upcoming campaigns and events, or other opportunities that may interest you.

If you do not want to receive any marketing or promotional material from us, you can opt out by notifying us using the contact details below, or by following the unsubscribe instructions on any marketing materials you have received.

9. HOW WE HOLD YOUR PERSONAL INFORMATION

We take all reasonable steps to protect your personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure. For example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to our computer systems.

We use industry-standard encryption (SSL/TLS) to protect the transmission of information via our websites. However, we encourage users to exercise care when sending personal information online. We take steps to destroy or de-identify information that we no longer require. We retain your personal information in accordance with our Data Retention Policy and as required by Australian law. Generally, we retain donor and financial records for 7 years for tax and audit purposes, and other information for as long as reasonably necessary for our operations and legal obligations.

We store information using electronic record keeping methods in secure databases. We may store your personal information with trusted third-party storage providers, including providers based in Australia and overseas. Where personal information is disclosed to overseas third parties, we take reasonable steps to ensure those parties handle your information in a manner consistent with the APPs.

You have the right to request access to, or correction of, your personal information held by us or our third-party providers. To make such a request, please contact us using the details set out in this Privacy Policy.

10. DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

In conducting our business, we may disclose your personal information to third parties for the purposes outlined above. These third parties may include, where appropriate:

- other The Hunger Project offices
- financial institutions for payment processing;
- our contracted service providers, including;
 - event and ticketing providers;
 - delivery and shipping providers;
 - IT service providers; and
 - external business advisers (such as auditors and lawyers); and
- if you are a job applicant, referees whose details you provide to us.

We may also disclose your personal information to other third parties and for other purposes where we are required or permitted by law to do so (including where you have provided your consent).

11. OVERSEAS DISCLOSURE

We may disclose some of your personal information to our partners or service providers some of whom may be based overseas.

Before we disclose your personal information to an overseas recipient, we take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to that information.

12. ACCESS AND CORRECTION OF YOUR PERSONAL INFORMATION

You have the right to access the personal information that we hold about you and request its correction if it is inaccurate, out of date, incomplete, irrelevant or misleading. You may do so by contacting us using the contact details set out below.

We will respond to all requests for access to or correction of personal information within a reasonable period.

We will generally provide you with access to your personal information (subject to some exceptions permitted by law) but may charge an access fee to cover the cost of retrieving and making it available to you.

If we refuse your request to access or correct your personal information, we will provide you with written reasons for the refusal and information about how you can complain about the refusal.

13. COMPLAINTS OR QUESTIONS ABOUT PRIVACY

If you have any complaints with regard to our collection, use or management of your personal information or if you'd like further information about our Privacy Policy, please contact us:

- Email: thpaus@thp.org
- Phone: 02 9222 9088
- Mail: The Hunger Project Australia, GPO Box 2108, Sydney NSW 2001

If you make a complaint, we will endeavour to respond to it as soon as possible. If you are dissatisfied with our response, you have the right to make a complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by email at enquiries@oaic.gov.au.

For further information about privacy in general, please refer to the Office of the Australian Information Commissioner's website: www.oaic.gov.au.

14. DATA BREACH NOTIFICATION

In the event of a data breach that is likely to result in serious harm, we will notify affected individuals and the Office of the Australian Information Commissioner as required by law, in accordance with our Data Breach Response Plan.

15. AMENDMENTS OF THIS PRIVACY POLICY

We may modify this privacy policy from time to time. We may notify you about changes to this privacy policy by posting an updated version on our website. We encourage you to check our website from time to time to ensure you are familiar with our latest privacy policy.

16. POLICY OWNER AND REVIEW

The policy is approved by the National Board and will be reviewed annually or as required by changes in legislation or organisational practice.

This policy is owned by the Risk, Compliance and Operations Manager.

Review period:	Annual	Policy Owner:	Risk, Compliance and Operations Manager
Version	Date Approved	Approved by	Changes:
3	Feb 2026	THPA National Board	<ul style="list-style-type: none"> - ABN reference removed for consistency with other policy documents - Key terms section included for clarity - Sensitive information definition added to address APP 3 compliance gap - Explicit notification statement included for collection of personal information at or before time of collection (APP 5.2) - References to affiliated/related companies removed as other THPA offices are separate legal entities - Cookies statement updated to reflect that cookies can collect linkable data which, when combined with other information, may identify an individual and therefore constitute personal information - Retention and disposal practices added, including destruction or de-identification of information no longer required (APP 11) - Overseas disclosure provisions strengthened to include reasonable steps obligations for recipient (APP 8.1) - Written reasons and complaint mechanism information now required when refusing access or correction requests (APP 13.4)

			<ul style="list-style-type: none"> - Data Breach Response Plan aligned with Notifiable Data Breaches scheme referenced - Policy owner updated from Administration Manager to Risk, Compliance and Operations Manager
2	May 24 th , 2023	THPA National Board	Policy reviewed and updated in response to updates to privacy legislation
1		THPA National Board	