

1 Purpose

This policy explains how The Leprosy Mission Australia (TLMA) collects, holds, uses, discloses and protects personal information, and how a person can access their information, ask for their information to be amended or corrected, or make a complaint.

TLMA publishes this policy so that everyone who supports or interacts with us can see, in plain language, how we handle their personal information.

2 Scope

This policy applies to the personal information TLMA collects and holds about:

- individual donors and supporters;
- job applicants;
- staff members;
- volunteers, including Board members;
- contractors; and
- other people who contact or interact with TLMA.

This policy does not apply to how TLMA treats an existing employee record, where that treatment relates directly to a staff member's current or former employment with us. The clause on job applicants, staff and contractors explains what this means in practice.

3 Policy statements

3.1 Our commitment to privacy¹

TLMA respects the privacy of everyone we interact with and complies with the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth), and with the Payment Card Industry Data Security Standard for any payment card information we handle.

Where it is lawful and practicable, we give a person the option of dealing with us anonymously or under a pseudonym.

3.2 What personal information we collect²

TLMA may collect and hold personal information about everyone the organisation interacts with.

This may include a person's name, contact details, date of birth, and bank or payment details for credit cards are tokenised securely through payment gateway providers that are in compliance with PCIDSS (Payment Card Industry Data Security Standard) requirements. Where relevant, it may also include details about a person's involvement with TLMA's programs, events or fundraising activities.

¹ Legislative basis: APP 1 (open and transparent management); APP 2 (anonymity and pseudonymity).

² Legislative basis: APP 3 (collection of solicited personal information).

3.3 Sensitive information³

Some personal information is 'sensitive information' under the Privacy Act — for example, a person's religious beliefs, health information, or racial or ethnic origin. TLMA only collects sensitive information with the person's consent, and only where it is reasonably necessary for our activities.

For example, with a supporter's consent, we may collect their religious affiliation to communicate with them in a way that reflects their preferences. TLMA will not disclose sensitive information without the individual's consent, except where the law requires or allows it.

3.4 Images and stories⁴

TLMA will not collect, use or publish an identifiable image, story or other personal information about a person affected by leprosy, or any other individual, without first obtaining their consent. We follow our Safeguarding Policy and Procedures whenever we collect or share images and stories, to protect the dignity of the people we work with.

3.5 How we collect personal information⁵

TLMA usually collects personal information directly from the individual — for example, through forms, face-to-face meetings, phone calls, emails, online donation or sign-up forms, and the delivery of our services. Sometimes we receive personal information about a person from someone else — for example, when a supporter refers a friend, or asks us to send information to someone on their behalf. Where this occurs TLMA will take reasonable steps to notify the individual that their information has been collected and how it will be handled.

3.6 Unsolicited personal information⁶

If TLMA receives personal information it did not ask for, we decide whether we could have lawfully collected it for one of our purposes. If not, we destroy or de-identify the information as soon as reasonably practicable.

3.7 Using personal information⁷

TLMA collects and uses personal information to tell people about our services, programs and fundraising activities, and to provide anything a person has asked for. We may also use personal information for a related purpose a person would reasonably expect, or one they've consented to. This includes:

- keeping supporters informed about our work through letters, emails, newsletters and magazines;
- running day-to-day and special activities, such as events and appeals; and
- managing our operations, including providing receipts or following up on orders.

³ Legislative basis: APP 3.3–3.4 (collection of sensitive information); APP 6 (use and disclosure).

⁴ Legislative basis: APP 3; APP 6; ACFID Code of Conduct (dignified representation of the people TLMA works with), TLM guidelines on consent for use of image and stories.

⁵ Legislative basis: APP 3 (collection directly from the individual, and limited exceptions).

⁶ Legislative basis: APP 4 (dealing with unsolicited personal information).

⁷ Legislative basis: APP 6 (use and disclosure for the primary purpose of collection, or a related secondary purpose).

When our staff record contact or file notes about a person, they leave out personal opinions or value judgements.

3.8 Direct marketing and fundraising communications⁸

TLMA's fundraising and communications help grow and sustain our mission. Where we send direct marketing or fundraising communications, we:

- only do so where the person would reasonably expect it, or where they have consented;
- give the person a simple way to opt out at any time; and
- act on an opt-out request as soon as practicable.

TLMA does not sell or trade personal information for marketing purposes. See Key frameworks and mandates, below, for upcoming changes to consent requirements under the next tranche of Privacy Act reforms.

3.9 Sharing personal information⁹

TLMA does not disclose personal information to a third party, except where:

- the third party is contracted to us and working on our behalf (for example, a mail house);
- a volunteer needs the information to carry out a task for us; or
- we are required or authorised by law to disclose it.

We assign each supporter a unique supporter number and do not disclose it to anyone other than the supporter, except in the circumstances above.

Where we engage a contractor or service provider to handle personal information on our behalf, we require them, under contract, to protect that information in a way consistent with the APPs.

3.10 Sending information overseas¹⁰

TLMA will only send personal information about a person outside Australia if:

- the person has consented; or
- we reasonably believe the overseas recipient is subject to a law or scheme that protects the information in a way that is substantially similar to the APPs, and the person can enforce that protection; or
- another exception under the Privacy Act applies.

We are most likely to disclose personal information overseas when a person travels on behalf of, or on an event organised by or with, TLMA, or where we work with international program partners.

3.11 Storing and protecting personal information¹¹

TLMA takes reasonable technical and organisational steps to protect the personal information it holds from misuse, interference, loss, and unauthorised access, modification or disclosure. This includes password-protected computer systems, secure cupboards and locked rooms for

⁸ Legislative basis: APP 7 (direct marketing); Spam Act 2003 (Cth); Do Not Call Register Act 2006 (Cth).

⁹ Legislative basis: APP 6 (use and disclosure).

¹⁰ Legislative basis: APP 8; Privacy Act 1988 (Cth) s 16C (accountability for acts of overseas recipients).

¹¹ Legislative basis: APP 11.1 (data security); Notifiable Data Breaches scheme, Part IIIC of the Privacy Act.

physical records, and requiring staff to keep personal information confidential as a condition of their employment.

If TLMA experiences a data breach that is likely to result in serious harm to an individual, we will notify the Office of the Australian Information Commissioner (OAIC) and the affected individuals, in line with our Data Breach Response Plan.

3.12 How long we keep personal information¹²

TLMA keeps personal information only for as long as it is needed for the purpose it was collected, or a related purpose, unless the law requires us to keep it for longer.

See Job applicants, staff and contractors, below, for how long we keep the information of unsuccessful job applicants.

Our Data Retention Plan sets out how long we keep other categories of records, and how we destroy or de-identify personal information once it is no longer needed.

3.13 Automated decision-making and artificial intelligence¹³

TLMA uses automated processes, supported by AI within some of the software we use, to decide which fundraising communications a person receives, based on their giving history. We do not use AI to deliver our services or to collect personal information nor do we place personal information into AI. Our use of AI is limited to supporting these communication decisions.

A staff member oversees this process, checking the data broadly rather than approving each individual decision.

3.14 Accessing and correcting personal information¹⁴

A person can ask TLMA for access to the personal information we hold about them and ask us to correct it if it is wrong. To do this they should contact our Privacy Officer in writing (see Contact us, below). We will respond within a reasonable time.

TLMA undertakes to keep the personal information it holds accurate, complete and up to date. A person can also update their own details by contacting our Customer Service Team during office hours.

3.15 If someone has a complaint¹⁵

If a person believes TLMA has breached their privacy, they can complain to our Privacy Officer, in writing or by phone (see Contact us, below). We will:

- acknowledge the complaint and explain our complaints process;
- investigate the complaint;
- respond with the outcome of the investigation, generally within 30 days; and
- keep a record of the complaint and its outcome.

¹² Legislative basis: APP 11.2 (destruction or de-identification of personal information).

¹³ APP 1 (open and transparent management); APP 5; Privacy and Other Legislation Amendment Act 2024 (Cth) (automated decisions, effective 10 December 2026).

¹⁴ Legislative basis: APP 10 (data quality); APP 12 (access); APP 13 (correction).

¹⁵ Legislative basis: APP 1.4(e) (complaints handling).

If a person is not satisfied with our response, they can complain to the OAIC at oaic.gov.au.

3.16 Job applicants, staff and contractors¹⁶

TLMA collects personal information from job applicants and contractors mainly to assess their suitability for a role or contract. We destroy the personal information of unsuccessful applicants within six months of the successful applicant completing probation.

This policy does not apply to how TLMA treats an existing employee record, where that treatment relates directly to a staff member's current or former employment with us. We still protect the personal information in employee records, and handle it under our employment-related policies.

3.17 Children and vulnerable people¹⁷

TLMA takes extra care when handling the personal information of children and vulnerable people, including where we feature a young person in our fundraising or communications materials. We only do so with the consent of the young person, or their parent or guardian, having regard to the young person's age and capacity to understand what they are consenting to.

4 Commitments

TLMA will:

- review our privacy practices annually, and monitor them to ensure they remain secure;
- train staff and volunteers who handle personal information on their privacy obligations;
- keep this policy and our related privacy documents up to date as privacy law changes; and
- treat any suspected data breach seriously and respond in line with our Data Breach Response Plan.

5 Key frameworks and mandates

Framework	What it means for TLMA
Privacy Act 1988 (Cth) and the Australian Privacy Principles	Sets out TLMA's core obligations for handling personal information.
Privacy and Other Legislation Amendment Act 2024 (Cth)	Introduced the first tranche of reforms, including new civil penalties, the statutory tort for serious invasions of privacy (effective 10 June 2025), and new automated decision-making disclosure requirements (effective 10 December 2026).
Payment Card Industry Data Security Standard	Sets security requirements for the payment card information TLMA handles.
Spam Act 2003 (Cth) and Do Not Call Register Act 2006 (Cth)	Regulate TLMA's email, SMS and telemarketing communications.
FIA Code of Conduct	Sets fundraising standards TLMA follows as a member of the Fundraising Institute of Australia.

¹⁶ Legislative basis: Privacy Act 1988 (Cth) s 7B(3) (employee records exemption).

¹⁷ Legislative basis: OAIC guidance on children and vulnerable individuals; anticipated Children's Online Privacy Code (expected 10 December 2026).

Note: the second tranche of Privacy Act reforms is not yet law. This is the one place this policy discusses it in detail, to avoid repeating the point elsewhere. The proposed changes include stricter, channel-specific consent requirements for direct marketing (see Direct marketing and fundraising communications, above). TLMA is monitoring these changes and will update this policy once they are finalised.

6 Roles and responsibilities

Role	Responsibility
TLMA Board	Approves this policy and holds ultimate responsibility for TLMA's privacy governance.
Chief Executive Officer	Is accountable for TLMA's compliance with this policy and the Privacy Act.
Privacy Officer	Manages TLMA's day-to-day privacy compliance, handles access, correction and complaint requests, coordinates TLMA's response to any data breach, and reviews this policy.
Staff, volunteers and contractors	Follow this policy, complete TLMA's privacy training, and report any suspected data breach to the Privacy Officer immediately.

7 Related documents and legislation

- Privacy Act 1988 (Cth), including the Australian Privacy Principles
- Privacy and Other Legislation Amendment Act 2024 (Cth)
- Payment Card Industry Data Security Standard
- Spam Act 2003 (Cth)
- Do Not Call Register Act 2006 (Cth)
- FIA Code of Conduct
- TLMA Safeguarding Policy and Procedures
- TLMA Data Breach Response Plan
- TLMA Data Retention Plan and Schedule
- TLMA Privacy Management Plan

8 Policy review

This policy will be reviewed at least annually. Review may also be triggered by changes in applicable legislation, regulatory guidance, organisational practices, privacy risks, privacy incidents, or any other material change affecting the management of personal information.

9 Contact us

Privacy Officer
The Leprosy Mission Australia
37 Ellingworth Parade (PO Box 293)
Box Hill VIC 3128
Tel: (03) 9890 0577
Email: hello@leprosymission.org.au

Revision history

Version	Date	Author	Summary
9.0	28 February 2026	Lydia Reid	New draft created for next revision
9.1	[date]	Nerida Collard	Full rewrite into TLMA policy voice; aligned to the current APPs, the 2024/2025 Privacy Act reforms and FIA guidance

Document approval

Version	Date	Approved by
1.0	28 April 2003	TLMA Board
2.0	16 April 2007	TLMA Board
3.0	11 August 2008	TLMA Board
4.0	3 September 2012	TLMA Board
5.0	23 June 2014	TLMA Board
5.3	26 June 2017	TLMA Board
6.1	24 January 2018	TLMA Board
7.2	26 June 2023	TLMA Board
8.1	28 February 2026	TLMA Board
9.1	31 August 2026	TLMA Board

Undertaking for the Protection of Personal Information

The Leprosy Mission Australia has produced a set of policies and procedures to ensure that the rights of individuals are protected at all times. All employees and volunteers are required to adhere to The Leprosy Mission Australia's policies and procedures at all times.

It is paramount that all employees are vigilant in ensuring that systems and procedures are maintained so that there cannot be a breach of the policies.

I acknowledge that I am prohibited from discussing or reviewing individuals' files or details for any reason other than in the performance of my duties.

I have read the Privacy Policy of The Leprosy Mission Australia and discussed with the Privacy Officer the importance of privacy and provide this undertaking as follows:

I am aware of the organisation's Privacy Standard Operating Procedures and accept the need to adhere to their requirements.