

Policy No.	P04
Version	2
Board Approval	9 Dec 2025
Review Date	9 Dec 2028



PRIVACY AND CONFIDENTIALITY POLICY

1. Introduction

- 1.1 Building East Timor Through Education/Resources (“BETTER”) is committed to maintaining the highest standards of confidentiality and privacy in all aspects of its operations.
- 1.2 This policy applies to the Board Directors, permanent or casual employees, suppliers, visitors, sponsors, donors, as well as volunteers and interns at BETTER (“Personnel”), whether based in Australia, Timor Leste or elsewhere.
- 1.3 This policy should be read in conjunction with our Governance Policy, our Accountability and Transparency Policy, our People, Culture and Protection Policy, and our Record Retention Policy (all found on our website www.bettertimor.org).

2. Purpose

- 2.1 The purpose of this policy is to establish a framework for the safeguarding of personal information in accordance with Australian and Timor-Leste privacy laws, and the ACNC Governance Standards.
- 2.2 It also supports effective governance by ensuring responsible management of confidential organisational information to enable informed decision-making

3. Principles

- 3.1 All confidential information and personal data will be managed with integrity, respect, and in strict compliance with applicable laws and BETTER’s governance standards. This includes implementing appropriate technical, administrative, and physical safeguards to prevent unauthorised access, misuse, or disclosure.
- 3.2 BETTER will only disclose confidential or personal information when required by law, for legitimate operational purposes under confidentiality agreements, or with the informed consent of the individual.
- 3.3 Confidentiality obligations do not end when a person ceases their role with BETTER. All Personnel remain bound by these obligations indefinitely to protect BETTER’s integrity and the trust of its stakeholders.

4. Collection of Personal Information

- 4.1 BETTER will collect personal information only when it is reasonably necessary for its operations and activities.
- 4.2 Personal information may include names, contact details, payment information, and, where relevant, demographic details, images, or personal stories provided voluntarily by individuals.
- 4.3 Information will be collected directly from individuals wherever practicable through secure channels

such as online forms, written applications, email, telephone, or face-to-face interactions.

- 4.4 Where information is collected from third parties, BETTER will take reasonable steps to notify individuals of the collection and its purpose.
- 4.5 BETTER will ensure that individuals are informed about why their information is being collected, how it will be used, and their rights under the Australian *Privacy Act 1988* (Cth) and any other applicable laws. Consent will be obtained where required by law or where sensitive information is involved.

5. Use and Disclosure

- 5.1 Personal information will be used solely for purposes directly related to BETTER's mission, such as processing donations, issuing receipts, fundraising, maintaining donor communications, and meeting legal and regulatory obligations
- 5.2 BETTER will never rent, sell, exchange, or otherwise disclose donor or supporter information for marketing or commercial purposes.
- 5.3 Disclosure to service providers (eg. banking, IT, mail services) will occur only under strict contractual obligations that include confidentiality and compliance with privacy laws.

6. Data Security

- 6.1 All personal information will be stored securely, whether in electronic or physical form, and protected against unauthorised access, alteration, or disclosure in accordance with BETTER's data security protocols and the Australian Privacy Principles.
- 6.2 BETTER will take all reasonable steps to prevent misuse, loss, or unauthorised access to personal information.
- 6.3 Personal information will be permanently de-identified or securely destroyed when no longer legally or operationally required.
- 6.4 BETTER will comply with applicable data breach notification requirements under the Australian *Privacy Act 1988* (Cth) and any other applicable laws.
- 6.5 Payment card data will be handled in compliance with the Payment Card Industry Data Security Standard.

7. Access and Correction

- 7.1 Individuals may request access to or correction of their personal information by contacting BETTER. Identification will be required to verify the request.
- 7.2 Requests will be addressed within a reasonable timeframe and may be refused in accordance with legal provisions, such as where disclosure would infringe another person's privacy or legal privilege.

8. Organisational Confidentiality

- 8.1 BETTER is committed to responsibly managing sensitive organisational information to uphold integrity and trust. Protecting such information ensures:

- i. Integrity of Governance: Confidentiality of Board deliberations, legal advice, and financial data supports sound decision-making and compliance with governance standards.
 - ii. Prevention of Misuse or Harm: Limiting access to sensitive information reduces risks of reputational damage, legal breaches, and conflicts of interest.
 - iii. Effective Decision-Making: Confidentiality obligations allow open and frank discussion within governance bodies while safeguarding the organisation's ability to operate ethically and transparently.
- 8.2 This approach does not limit BETTER's commitment to transparency; rather, it ensures that information is shared appropriately and lawfully, balancing openness with the need to protect stakeholders and the organisation.
- 8.3 Board members, members of Board Committees, and any meeting guests must maintain strict confidentiality regarding all Board Papers, committee documents, and meeting discussions. This obligation continues after their role ends.
- 8.4 Personnel must not use confidential information for personal benefit or in any way that could harm BETTER or its stakeholders.
- 8.5 Requests for access to confidential organisational information or documents will be assessed on a case-by-case basis. Each request will be considered in light of legal obligations, privacy requirements, governance principles, and the potential impact on BETTER's integrity, operations, and stakeholders

9. Complaints Management

- 9.1 Concerns or complaints regarding privacy practices should be directed to BETTER's Privacy Officer at info@bettertimor.org.
- 9.2 BETTER will promptly investigate all reported breaches of confidentiality or privacy and implement appropriate corrective measures where a breach is confirmed.
- 9.3 If a concern cannot be resolved internally, individuals may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) or the relevant authority in their jurisdiction.