



# External Privacy Policy

## Policy Statement

CCI are committed to maintaining the accuracy, confidentiality and security of personal information, and complying with its obligations under the *Privacy Act 1988 (Privacy Act)* and the Australian Privacy Principles (**APP**) in respect of that information. This Privacy Policy describes what personal information CCI collects from its members or visitors, how we use and disclose that information and what controls you have over our use of it.

This Privacy Policy applies to personal information collected from:

- a. organisations or individuals that seek to be, are, or were members of CCI (collectively, a **member**); and
- b. other businesses, entities, agents, suppliers or persons (collectively, a **visitor**) that access our Services.

We may collect personal information via our Website or via the CCI services we provide, including web-based services, communications and electronically delivered information (**Services**).

Please read this Privacy Policy carefully. Your use of any part of our Website or Services will constitute your consent to the collection, transfer, processing, storage, disclosure and other uses of your personal information in accordance with this Privacy Policy. If you do not agree with the terms and conditions of this Privacy Policy, please do not use our Website or Services.

We implement a variety of security measures to protect your personal information whilst it is in our possession, including when a user logs in, submits, or otherwise accesses their information. That personal information may be collected automatically or entered voluntarily. It will be dealt with in accordance with the procedures below.

1. We will collect or use various types of personal information including your name, Australian Business Number, phone number, address, email address, the contact person for your business, and credit card or other payment information. This personal information may be provided to our Preferred Supplier Network for the purpose of our preferred suppliers providing you with goods, services, or other related services via the Marketplace Platform. We also collect certain transaction data, including sales data, and other details relating to purchases made through Our Preferred Supplier Network on the Marketplace Platform. These will be collected when you log on to Our Website and otherwise in connection with providing our Services, including but not limited to, when you provide feedback, change your contact or email preferences, respond to a survey, or communicate with Us for support or queries via email, telephone or our Website.
2. We may use the information We collect from You when You register to our Website, subscribe to our marketing services, respond to a survey or marketing communication, access the Website, or use certain other Website features, for the following purposes:
  - a. To personalize Your experience and to allow us to deliver the type of content and product offerings in which you are most interested;

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- b. To evaluate preferred supplier offerings, negotiate with current or potential preferred suppliers and invoice preferred suppliers;
- c. To improve our Website in order to enhance our Services;
- d. To allow Us to better service You in responding to Your service requests;
- e. To administer a contest, promotion, survey or other marketing or promotional tool; and
- f. To process Your transactions efficiently

We will only send you direct marketing communications and information via mail and email about our Services and the services of our preferred suppliers with your consent. If you do not provide your consent to receive direct marketing communications, you may opt-out of receiving marketing communications from us by contacting us at the details below or by using opt-out facilities provided in our communications. Other than personal information disclosed to our Preferred Supplier Network and Marketplace Platform referred to above, we do not provide your personal information to other organisations for the purposes of their direct marketing.

3. Your personal information is stored securely behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive, credit and commercial in confidence information you supply is encrypted via Secure Socket Layer (SSL) and Transport Layer Security (TLS) technology and is rated 128-bit or higher Advanced Encryption Standard (AES) encryption. We take reasonable steps to protect your personal information from misuse, interference and loss and from authorised access or disclosure. However, we cannot guarantee the security of information transmitted via the internet, and as such, transmission of personal information via the internet is at your own risk and we cannot be held responsible for the security of such information.
4. Once You have entered information onto the Website, You may amend it provided that You are a current member. Once Your membership has been deactivated by Us, You must not access data on our servers including through our Website.
5. If you make a payment via credit card, you agree that all credit card transactions are processed through a gateway provider and are not stored or processed on Our servers. The gateway provider will process payments and collect and use Your credit card and billing information. We do not receive details of your credit card directly and cannot be held liable for any issues arising from the processing of your card. Please refer to the relevant gateway provider's privacy policy on their website for further information on their privacy practises.
6. You agree and acknowledge that We may use and disclose Your personal information to authorised regulatory bodies or if required to do so by law.

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7. If we intend to sell the CCI business, the disclosure of Your personal information may be necessary during the sale process. If this occurs, we will ensure that there is a non-disclosure agreement in place to protect Your personal information, to the extent it is required to be disclosed.
8. Our Website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our Website as safe as possible.
9. Other than as set out in this Privacy Policy, We do not and will not sell or deal in personal or customer information. We will never disclose Your personal details to a third party other than to our Preferred Supplier Network, to the extent necessary to provide our Services to you or as required by law.
10. We may, however, use in a general sense without any reference to Your name, Your personal information to create marketing statistics, identify user demands and to assist CCI in meeting customer needs generally. In addition, We may use the information that You provide to improve the functionality and usefulness of Our Website and Services but not for any other use.
11. It is unlikely that we will need to disclose your personal information to an overseas recipient or otherwise store your personal information overseas. If we are ever required to do so, we will obtain your informed consent or ensure that the overseas recipients comply with the APPs.
12. For your convenience and to improve the usage of the Website and our Services, we may insert links to or utilise the services of third-party websites and applications, including those of the Preferred Supplier Network and Marketplace Platform for which this Privacy Policy does not apply. CCI is not responsible for those third party websites, applications or resources, including all payment gateways. If you access such websites, applications or resources, you do so at your own risk and we make no representations or warranties regarding third parties' privacy practices. We encourage you to read the privacy statements/policies of every website, application or resource you use. When we do link to a third party website, application or resource, this does not automatically imply that CCI endorses that website, application, resource and their contents.
13. To improve your experience on our Website, we may use 'cookies': small data files that are served by our Website and stored on your device. These are used by us or third parties for a variety of purposes including to operate and personalise the website. Cookies may be used for recording preferences, conducting internal analytics, conducting research to improve our offering, assisting with marketing and delivering certain website functionality. You may refuse to accept cookies by selecting the appropriate setting on your internet browser. However, please note that if you do this, you may not be able to use the full functionality of our Website.

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14. Where requested, we will provide you with a copy of the personal information that we hold which relates to you, provided that the request is made in accordance with the APPs. We will also update any inaccurate information about you if you inform us that the information is inaccurate, out of date, incomplete, irrelevant or misleading. There are no charges for requesting access to or the correction of your personal information, however if the volume of information we hold is excessively large, we reserve our rights to charge you any reasonable administration fees (including fees for photocopying) associated with your request. You can contact CCI regarding access to or correction of your information by any of the following methods:
- Email: [admin@ccigrouppurchasing.org.au](mailto:admin@ccigrouppurchasing.org.au)
  - Post: 57/55 Melbourne Street, North Adelaide SA 5006
  - Phone: 1300 559 318
15. We will respond to those requests within a reasonable period of time in accordance with our obligations under the Privacy Act. If we refuse a request to access or correct personal information, where reasonable, we will provide you our reasons for doing so and information about your ability to complain about such refusal.
16. If you have a complaint about our Privacy Policy or the collection, use, disposal or destruction of your personal information, your complaint should be directed in the first instance to our privacy officer at the details set out above. We will investigate your complaint and attempt to resolve any breach that might have occurred in relation to the collection, use or destruction of Personal Information held by us about you in accordance with the Privacy Act. If you are not satisfied with the outcome of this process, then you may contact the Office of the Australian Information Commissioner.
17. CCI will occasionally update this Privacy Policy to reflect company and customer feedback. If we do so, the latest version of our Privacy Policy will be available on our Website and will apply to all your personal information held by us at that time. CCI encourages you to periodically review this Privacy Policy to be informed of how CCI is using, collecting, protecting and disclosing your personal information.
18. In this Privacy Policy:
- “CCI”, “Us”, “We” or “Our” means Combined Charities Incorporated;
  - “Marketplace Platform” means the online marketplace platform managed by Fresho Pty Ltd, and any other technology application or platform used by CCI’s Preferred Supplier Network in the future;
  - “personal information” means information about you which personally identifies you or may reasonably be used to personally identify you;
  - “preferred supplier” means any person that CCI has entered into a preferred supplier agreement for the supply of goods or services to members;

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- e. “Preferred Supplier Network” means the third party suppliers of goods and services contracted by CCI to provide goods and services to organisations that have become members of CCI via the Marketplace Platform;
- f. “Website” means the CCI website located at [www.ccigrouppurchasing.org.au](http://www.ccigrouppurchasing.org.au) or any other website from time to time which our services are promoted and/ or delivered;
- g. “you” means you and anyone acting on your behalf or with your implied authority.

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