



Crossway Baptist Church Inc.

Privacy Policy

September 2023

Contents

1	Introduction.....	3
2	What Is Personal Information?	4
3	Whose Personal Information Does Crossway Collect And Why?	4
4	What Kind Of Personal Information Does Crossway Hold?	4
5	How Do We Collect And Hold Your Personal Information?	6
6	How Do We Use Your Personal Information?	9
7	What Happens When We No Longer Need Your Personal Information?	9
8	Who Does Crossway Share/Disclose Your Personal Information With?	9
9	Sharing Of Information Outside Of Australia?	11
10	Accessing And Correcting Your Personal Information.....	12
11	Quality Of Personal Information.....	12
12	Updates To This Privacy Policy	13
13	How To Make A Complaint.....	13



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Approved by	Church Board
Responsibility	Director of Operations
Next Review	6 September 2025 (2 Years)

1 Introduction

Crossway Baptist Church Inc. (Registration Number: A0045459U), respects your personal information and upholds your rights to privacy protection in accordance with this Privacy Policy and the Australian Privacy Principles contained in the Privacy Act 1988.

Crossway believes that the Bible is God's word and the ultimate authority by which we live (2 Timothy 3:16-17). Crossway's commitment to protecting your privacy and promoting the responsible collection, storage and use of your personal information is guided by our motivation to uphold Biblical values and fulfil our obligations to government-legislated requirements.

The Bible:

- places a high value on maintaining confidence and being trustworthy with what has been entrusted to our care (Proverbs 11:13; 1 Timothy 6:20)
- encourages discretion and prudence as hallmarks of wisdom and right living (Proverbs 2:11; Proverbs 12:23; Proverbs 21:23)
- teaches that God has established governments and believers are to obey the law (except where any laws are contrary to Biblical teaching) (Romans 13:1; Daniel 2:21; 1 Peter 2:13-17)

This Policy covers how Crossway Baptist Church Inc. (in its personal capacity or as trustee of any trust) and its related entities, Crossway LifeCare Ltd (ABN: 61 144 934 592), The Trustee For Crossway Kingdom Fund (ABN: 90 518 196 773), Crossway Pre-School Ltd (ABN: 78 558 769 959) and Crossway Creative Arts (ABN: 92 636 721 750) (hereinafter to be collectively referred to as "Crossway") handle your personal information. To make it easy for you to deal with Crossway and provide you with a more personal and consistent experience, Crossway may exchange and combine personal information between the related entities of Crossway.

By visiting our website or using any of our services, you agree that your personal information will be handled as described in this Policy.



2 What Is Personal Information?

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

3 Whose Personal Information Does Crossway Collect And Why?

Crossway collects personal information from people who are connected to Crossway and/or its services including employees, employment candidates, attendees, members, donors, volunteers, visitors, missionaries, events/activities participants or invitees, subscribers to our mailing lists or newsletters, anyone streaming or downloading any Crossway material, other persons who request our services, contractors, licensors, licensees, partners and suppliers etc.

We collect, hold, use and disclose personal information to carry out our functions or activities, which include:

- a) providing religious ceremonies, services and pastoral care in the Christian faith, for example baptism, prayer or counsel;
- b) leading and facilitating a community of people in the Christian faith;
- c) running other charitable activities and events such as community groups, mentoring, youth camps, young adult retreats and counselling services (LifeCare);
- d) administering your relationship with Crossway, meeting your ministry needs and facilitating the delivery of our services;
- e) ensuring the safety and security of children who participate in ministries or Crossway programs;
- f) managing our personnel, including staff, contractors and volunteers;
- g) promoting our events, letting you know about Crossway's worship services, events, ministry material, fundraising activities and other programs and information; and
- h) complying with our legal obligations (governance, financial management, taxation etc.).

4 What Kind Of Personal Information Does Crossway Hold?

4.1 Personal Information

The type of personal information we collect depends on the reason for collecting it.

Personal Information may include your name, birth date, identification numbers and contact details – including postal address, email address and telephone numbers, or other relevant information about you.



- a) If you are part of a household, information relating to your household may be collected – such as personal information of your family members and identity of person(s) who have authority to collect/pick up your children from activities run by Crossway
- b) If you are a member of Crossway, information including name, address, the date of becoming a member of Crossway must be collected and entered into the Register of Members
- c) If you choose to make Crossway your home church, information / records of your involvement / progress in partnership with Crossway's mission and services may be collected. Such information includes your background, communications, role(s) and involvement in the Crossway's activities / services. Other information that may be collected include checks / records that are pre-requisite for your role(s) at Crossway – comprising Working With Children Check, CrimCheck, first aid certificate, food processing certificate, etc.
- d) If you tithe / donate / make payments / sponsor, information relating to your tithing / donations / payments / sponsorships / transaction may be collected, including its history, bank account and debit/credit card information. In part, such information is required for Crossway to issue tax deductible receipts.
- e) If you participate in generational ministries, your date of birth may be required to allocate you to the right age group for an event, such as for youth or young adult groups.
- f) If you are a client of Crossway LifeCare, your personal information is collected for the purpose of providing you with the agreed service(s). Due to the sensitive and specialist nature of work at LifeCare, the privacy and handling of clients' personal information is guided and protected by the Privacy Act 1988 and Health Records Act 2001 (VIC).

4.2 Video, Images and Security Recording

- a) Crossway frequently records video or images of services and activities. These videos and images of the people attending or participating in these services and activities may be recorded, used and shown for information, ministry, teaching, fundraising and/or promotional purposes. By attending these services and activities, you agree and give your consent to Crossway with regard to the video and images recording and using your images in these recordings for such purposes.
- b) In addition, Crossway operates video surveillance and recording for security purposes on its premises. Signage of this practice is posted on external entrances to the premises and internal areas within the premises. Crossway may use and disclose the



video footage from these cameras for legal and security reasons.

4.3 Sensitive Information

Sensitive information concerning your health, religious belief, criminal history, education background, academic/professional qualification/working experience, financial conditions, court determinations and any other specific information relevant to the services or assistance you have requested from Crossway may also be collected. We may also collect the information above if you are involved in providing Crossway services as a staff member or volunteer.

Sensitive information includes:

- a) health information, such as information about a disability, illness or injury. We may collect your health information to help us best work with you and understand your needs, such as any disability that may impact how you participate in our community. For example, we need to know a child's allergies or medical conditions to meet our duty of care.
- b) religious beliefs and affiliations. For example, if you are a member of Crossway, we collect the date you became a member for inclusion on the Register of Members and if you become involved at Crossway as a volunteer, we collect information about your involvement and partnership with Crossway's activities and services.
- c) criminal record. If you work or volunteer with Crossway, we collect information about you as a pre-requisite for the role. This will normally include checks and certificates such as a Working with Children clearance and CrimCheck.
- d) qualifications and certificates. Particularly if you are involved in providing Crossway services, we may need to sight and/or record your relevant licences or certificates, for example first aid or food processing certificates.
- e) racial or ethnic origin when it is relevant to providing you services in languages other than English. For example, we use this information to allocate you to the right campus.

5 How Do We Collect And Hold Your Personal Information?

5.1 Collecting information directly from you

Where possible, we collect your personal information directly from you. We try to only collect the information we need for the particular function or activity we are carrying out. We mainly collect personal information directly from you when you give it to us through paper forms, online forms, in person or over the phone. Crossway often uses electronic means such as website, email or SMS to verify your details.



5.2 Collecting information via website browsing and cookies

Our website, www.crossway.org.au, is hosted in Australia. Our website uses cookies. Cookies do not identify you individually (ie. Crossway cookies do not collect your name). However, cookies do collect unique information to identify devices such as your computer or phone. Cookies do this normally with an Internet Protocol (IP) address. You can set your browser to notify you when you receive a cookie so you can accept or reject it.

Cookies collect information about:

- a) which pages of our website you view;
- b) how you reach those pages, such as the search engine keyword you used to find our site;
- c) what you do on a page;
- d) how long you stay on our website;
- e) your type of browser and operating system; and
- f) the amount of data in bytes you download from our site.

5.3 Collecting information from Third Parties

We also obtain personal information from third parties such as your children, parents or guardians, authorised persons, regulatory authorities (such as Department of Justice), service providers (such as fundraising service providers eg. Pushpay), health services professionals, social and community workers.

Where you provide us with personal information about someone else you must have their consent to provide their personal information to us based on this Policy and have read and understood this Policy and consent to us collecting, using and disclosing the information that you provide as described in this Policy.

5.4 Collecting Information from Social Networking Services

We use social networking services such as Twitter, Facebook, Instagram, TikTok, Apps and YouTube to communicate with the public about our services. When you communicate with us using these services, we may collect your personal information but we only use it to help us to communicate with you and the public. The social networking services will also handle your personal information for their own purposes, according to their own privacy policies. You can access their privacy policies on their websites.

5.5 Consequence of not providing your Personal Information

If you don't provide some or all of the personal information to us, we may not be able to:



- a) interact with an individual or provide ministry opportunities in a meaningful way; and / or
- b) provide you with access to some or all of our services or the assistance you have requested
- c) meet our legal obligations eg. to maintain a register of members under the Associations Incorporation Reform Act 2012 (Vic).

5.6 Anonymity or using a pseudonym

You are not obliged to give us your personal information. If you have a general enquiry, you can choose to do this anonymously or use a pseudonym. However, if you choose not to provide Crossway with your personal information, such as your name or address, the range of options and services to adequately address your circumstances may be limited.

5.7 Purpose for personal information collection

We collect your personal information in connection with carrying out our activities, such as:

- a) Support services: to administer your relationship with Crossway, meet your ministry needs, ensure security of children's participation in ministries and facilitate delivery of other services.
- b) Communications and event promotions: to let you know about Crossway's worship services, events, ministry material, fundraising activities, any other programs and information.
- c) Compliance with laws/regulations: we collect information about you because we are required or authorised by law to collect it. There are laws / regulations that affect Crossway, including Baptist Union Incorporation Act 1930 (Vic), Associations Incorporation Reform Act 2012 (Vic), Corporation Act 2001 (Cth), Australian taxation laws and other relevant laws and regulations from or related to Australian Charities and Not-for-profits Commission / Australian Taxation Office / Consumer Affairs Victoria which require us to collect personal information.

5.8 Opt Out

Whenever you are sent promotional and fundraising information by post, email or telephone, you will also be provided with an opportunity to opt out from receiving such material.



5.9 How do we hold/store your personal information?

We take reasonable steps to protect all of the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. Your personal information may be stored on a multi-factor authenticated password protected electronic database, a database maintained by a cloud-hosted service provider or other third party database storage or server provider.

We take steps to protect the security of the personal information we hold from both internal and external threats by assessing the risk of misuse, interference, loss and unauthorised access, modification or disclosure of that information (data breaches), taking measures to address those risks. Examples of how we limit the risk of data breaches include:

- a) restrictions on who has access to different types of information (access controls). We have locks on physical storage facilities such as filing cabinets and restrictions on information stored in our databases or on SharePoint;
- b) requiring digital information to be stored on Crossway databases or Crossway devices, and not locally on personal devices;
- c) strict password requirements and multi-factor authentication for access to online records or databases, and individual login access (audit trails).

However, as data transmission via electronic means (such as the internet) cannot be guaranteed to be totally secure, we do not accept responsibility for the security of information transmitted to or by us via electronic means. In addition, we are unable to ensure that third parties to whom we disclose your personal information will keep your information secure or otherwise observe the Australian Privacy Principles.

Backups of electronic information are written to drives or other media which may be stored both onsite or offsite, or both.

Hard copy information is generally stored in our office, which is secured to prevent entry by unauthorised people.

6 How Do We Use Your Personal Information?

We use your personal information in the following ways:

- for the purposes for which the information is provided to or collected by us;
- for purposes to which you have consented, expressly or impliedly;
- for purposes in connection with legal proceedings;
- for the purposes of direct marketing (such as through mail, telephone, email or other electronic means), including to provide you with information about our services;
- to provide communications or newsletters (both electronic and hardcopy) or news



or current issues;

- to have a record of the particulars of our employees, members and volunteers;
- to assist Crossway in its operations and planning; and
- for purposes otherwise permitted or required by law.

You may contact us if you do not want to receive any marketing information from us. We will then cease sending such information to you as soon as practicable. We will not provide your personal information to non-associated parties for the purposes of their direct marketing of goods or services to you, unless you agree for us to do so.

7 What Happens When We No Longer Need Your Personal Information?

We will only keep your information for as long as we require it for our purposes. We are also required to keep some of your information for certain periods of time under law, such as the Associations Incorporation Reform Act 2012 (Vic), Corporations Act 2001 (Cth), taxation laws, and child safety record-keeping and reporting requirements. Records connected to child safety are retained for 45 years.

When we no longer require your information, we will ensure that your information is destroyed, deleted or de-identified in a secure manner to maintain confidentiality (for example, by shredding or disposal in secure bins in our office).

8 Who Does Crossway Share/Disclose Your Personal Information With?

Crossway will not sell your personal information to third parties. In order to facilitate provision of ministry services and meet your needs, your personal information may be shared on a confidential basis:

- a) between the related entities of Crossway which have a need to know to provide a specific service to you including issuance of tax deductible receipts; or
- b) with third party service providers engaged by Crossway whose function is to maintain Crossway's database system, to facilitate mass communication of material prepared by Crossway or to effect electronic funds transfer which you have authorised; or
- c) other third party service providers and contractors who provide services to us, including persons who are not in Australia; or
- d) credit reporting agencies; or
- e) with our advisors if, in our opinion, the circumstances warrant us to seek professional counsel / advice to best address any concerns / issues; or
- f) with superannuation and managed funds organisations and salary packaging services providers – in the case of employees of Crossway; or
- g) with Government or regulatory bodies / agencies (may include Consumer Affairs



- Victoria, Australian Charities and Not-for-Profits Commission (ACNC), Australian Securities & Investments Commission (ASIC), the Australian Taxation Office and Baptist Union of Victoria) as required or authorised by law or regulations; or
- h) with parties that Crossway is required or permitted by law to disclose; or
- i) with any other parties that you have given your prior consent (expressly or impliedly) for disclosure; or
- j) with Government agencies to protect the welfare of children or vulnerable — adults in accordance with the relevant law; or
- k) with Government agencies to prevent or report a criminal act.

In order to facilitate provision of ministry services and meet your needs, we may disclose your personal information for the following purposes:

- a) Fundraising and tax receipts: We disclose personal information between Crossway related entities so we can issue tax deductible receipts;
- b) Communication material: We disclose personal information to service providers for mass communication of material;
- c) Lifecare counselling: To provide you with counselling services offered by a related entity
- d) To give effect to your requests or consent: For example, to effect electronic funds transfers you have authorised;
- e) To meet legal obligations: We disclose personal information to parties when required or authorised by law, such as to Government agencies to meet compliances obligations (ACNC, ATO), safeguard children or vulnerable adults, report a crime, or when we receive a subpoena;
- f) To safeguard children or vulnerable adults: We will disclose your personal information where this is required to meet a reporting obligation and may disclose personal information, even when not required by law, if we consider there is a serious threat of harm to someone's life, health or safety;
- g) To provide a salary packaging service to employees: We disclose personal information to superannuation and managed funds;
- h) Seek professional advice: We disclose personal information to our advisors so we can continue to meet our legal obligations.

9 Sharing Of Information Outside Of Australia?

As most of our core data is stored on servers hosted in Australia, we do not disclose personal information overseas.

However, if any personal information collected by Crossway is stored or managed by a third



party on behalf of Crossway, the third party may store certain personal information outside Australia.

We may store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held.

When you communicate with us through a social network service such as Facebook or Twitter, the social network provider and its partners may collect and hold your personal information overseas.

10 Accessing And Correcting Your Personal Information

You have the right to ask for access to personal information we hold about you, and ask us to correct that information. You can ask for access or correction by contacting Crossway. Our contact details are at the end of the Policy. We will respond within 30 days.

In some circumstances, your request may be denied on any of the following basis:

- a) access would pose a serious threat to the life, health or safety of any individual, or to public safety; or
- b) access would have an unreasonable impact on the privacy of other individuals; or
- c) the request is frivolous; or
- d) as required or authorised by law or a court or tribunal order; or
- e) access would be unlawful; or
- f) access may prejudice commercial negotiations, legal proceedings, enforcement activities or appropriate action being taken in respect of a suspected unlawful activity or serious misconduct.

We will ask you to verify your identity before we give you access to your information or correct it. If we refuse your request, we will tell you the reasons in writing and how you can make a complaint about the refusal.

We may charge a reasonable fee for access to your information.

For security reasons, a written request will be required to access or correct your personal information.

11 Quality Of Personal Information

To ensure the personal information we collect is accurate, up-to-date and complete, we:

- a) record information in a consistent format;
- b) confirm the accuracy of information, where necessary. For example, we may conduct



- a census to update our database;
- c) promptly add updated or new personal information to existing records;
- d) regularly audit our contact lists to check their accuracy.

12 Updates To This Privacy Policy

We may review and update this Privacy Policy from time to time. A copy of this Privacy Policy is available on our website www.crossway.org.au and will be made available free of charge and in soft or hardcopy format as requested.

13 How To Make A Complaint

If you wish to complain to us about how we have handled your personal information, you can contact us via the contact details below.

We will contact you within 30 days, with either the results on an investigation, or if we require further investigation, an acknowledgement of your complaint

If you are not satisfied with how Crossway handles your complaint, you may make a complaint to the Office of the Australian Information Commissioner.

All queries can be directed to the Crossway Secretary via:

Email:	privacy@crossway.org.au
Telephone:	(03) 9886 3700
Post:	Crossway Baptist Church, 2 Vision Drive Burwood East VIC 3151

