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# Privacy Policy

## Introduction

This document outlines the policies and processes relating to the privacy of personal information acquired by Riding for the Disabled of the ACT Inc (Pegasus) in the course of its operation.

This document covers what information is being collected and why. It has been reviewed and updated in response to the implementation of the Australian Privacy Principles on 12 March 2014.

As well as the Australian Privacy Principles [See Att 1], the Payment Card Industry Data Security Standard [see Att 2] also applies to Pegasus.

## General Privacy Statement

The following statement or elements of it appear on the Pegasus website wherever questions of privacy are raised.

## Personal contact details

Pegasus is dedicated to protecting your privacy. We are committed to valuing and respecting the participants we serve along with their families and carers, our staff and volunteers, our donors, our friends, and our suppliers.

Three areas are of significant interest to us – personal contact details, medical details, personal financial details, and any images of, or information about, children and/or vulnerable people that may be generated as a result of a stakeholder's involvement with Pegasus.

Any of this data collected about our stakeholders in the reasonable course of running Pegasus is only retained if it is necessary. And if it is retained, it is kept strictly secure.

#### Personal contact details

We do not sell personal contact details to anyone. We only use this information to further Pegasus' objectives by identifying potential Programs for people in need, distributing our newsletter HoofPrint and other relevant correspondence, and better personalising your Pegasus interactions and experiences.

#### Personal financial details

We do not store personal financial details. Online credit card donations are processed using the Our Community GiveNow and SecurePay systems uses state-of-the-art encryption software.

Other credit card donations are processed manually using our online merchant facility SecurePay. In both cases, the card details are secure because the card is returned or the donation voucher is disposed of in a locked confidential waste bin.

#### Images of children and/or vulnerable people

We do not physically or electronically collect, display or distribute images of children and/or vulnerable people without first seeking the consent of a responsible person.

Members of the Pegasus community are not allowed to collect, display or distribute images of children and/or vulnerable people who are members of the Pegasus community other than their own child or children. All other images of the Pegasus community belong to Pegasus and will not form part of any other person's private media or communication channels such as Facebook.

Further details can be found in our privacy policy and our child protection policy. If you are at all concerned, you should speak to the Communications Manager or the Executive Officer at Pegasus.

## Stakeholders

The following Pegasus stakeholder categories are identified in the context of the privacy of their information:

- participants and their families and/or carers
- staff members and volunteers (including Board Members)
- donors, friends and their families and businesses
- suppliers.

## Contact details

1. If you have any questions, comments or concerns about our privacy policy or practices, or you wish to allege a privacy breach, please contact us in one of the following ways:
  - a. You can email the [Executive Officer](#)
  - b. You can phone the Executive Officer at Pegasus on 02 6254 9190
  - c. You can write to:

The Executive Officer

Pegasus – Riding for the Disabled

119 Drake Brockman Drive, Holt ACT 2615.

## Resolving privacy issues

2. At Pegasus, we value the contribution that people make to our success and know that privacy is a matter of trust. If you have a complaint about our privacy practices, please let us know. We will do our best to resolve any issues you have.
3. A person may allege a breach of the Privacy Policy, the Australian Privacy Principles [See Att 1], or the Payment Card Industry Data Security Standard [see Att 2] by contacting the Executive Officer at Pegasus. That person will be known as the complainant.
4. The complainant and the Executive Officer at Pegasus will discuss and agree a course of action to address the alleged breach.
5. The Executive Officer will investigate the alleged breach and the results will be communicated to the complainant in writing.
6. Where there is a potential conflict of interest, the Executive Officer will advise the Chief Executive Officer to investigate any concerns.

7. Should the stakeholder not be satisfied with the response, they may ask for the matter to be referred to the Pegasus Board. The Chief Executive Officer must then raise the matter with the Pegasus Board at the next meeting or to the Board President if time is a factor.
8. Where a person asks for a response, they can expect to hear from Pegasus within 4 weeks.

#### Updating your information

9. You can update your information by contacting us [See (1) above].
10. If at any time you want to know what personal information we hold about you, please contact the Executive Officer at Pegasus.
11. If you wish to have your personal information deleted, we will take reasonable steps to delete it unless we need to keep it for legal, auditing or internal risk management reasons.
12. If we are compelled by law to use personal information in ways other than as stated in this policy, we will ensure we comply with the requirements of Privacy law and update our website accordingly.
13. You may access and review personal information held by Pegasus by contacting the Executive Officer at Pegasus in writing or face-to-face, validating your identity, and providing the details that need to be changed.

#### Protecting children

14. If you are over 16, we will usually assume that you can make your own privacy decisions and provide your own personal details.
15. Where you are under 16 or where you are unable to provide information required for Pegasus to operate, we may need to confirm your decision with, or seek information from, your parent or guardian.
16. We also expect any stakeholder to take special care with the images of our participants that you may capture from our programs, just as we do. Please honour the consent or lack of consent given by individuals and/or their parents by not copying and/or distributing these images unless the Executive Officer approves of this activity.
17. Please refer to our Website Rules [See Att 3] for guidance on how you can use images from our website and our Child Protection Standards [See Att 4] for further guidance on use of child images generally.

## Collecting your information

### General

18. Pegasus collects information about you where we can directly from you and with your knowledge. You might:
  - a. telephone us
  - b. visit us at the Pegasus Farm
  - c. provide details at one of our events
  - d. contact us by email, via our website, or via social media
  - e. respond to our appeals or newsletters.
19. Typically, we might ask for your name, address, telephone number, email, payment card details and date of birth.

### Participants

20. If you are a participant or the guardian of a participant, we need certain medical information about the participant to make sure the participant gets the best out of their Pegasus experience.
21. Only the coaches who design the programs for individual participants have access to this information.

### Donors

22. Pegasus does not store credit card details. Online credit card donations can be made to Pegasus via the secure on-line facilities of Our Community.
23. Manual credit card donations can be made via our mobile donation facility or through our merchant facility. As soon as the information has been used for the purpose for which it was provided, it is disposed of in a locked confidential waste bin (hard-copy).
24. Only the administrative staff members processing the donation have access to the credit card information.

### Staff and Volunteers

25. We are very careful and particular about who works with our participants and our horses.

26. If you apply to work with us – including as a volunteer or Board Member – we will undertake background checks so that we can make an informed decision about your application.
27. Such information will include your skills, qualifications, work experience, and demeanor. This may be collected from your application, your online social media presences, and/or from referees.
28. As one of the final steps in any staff or volunteer engagement process, we will also ask for background checks – a [working with vulnerable people check](#).
29. Pegasus will provide you with further information about the background checks should you reach that stage of the engagement process.
30. If you are not prepared to have a [working with vulnerable people check](#), then you will not be able to join Pegasus in any capacity.

#### Website

31. Pegasus collects statistics on visitor traffic to our website by using “cookies”. Cookies are used as a standard by many websites.
32. These are anonymous and do not identify specific visitors. This enables us to understand how our website is used.
33. If you prefer not to allow the use of cookies, you may be able to adjust your browser to turn them off or notify you when they are being used.
34. However, if you disable cookies, you may not be able to access certain areas or take advantage of certain features on our website.
35. Sometimes we might have photos or stories about you if you have worked with us or attended one of our events. If we have not already received your permission to publicly use these photos or stories at the time of their collection, we will only use these pictures with your permission.

#### Using your information

36. If you are a donor and we are unable to provide you with a tax receipt at the time of your donation, we may need your name and postal address to send you a receipt.
37. We will also periodically tell you about our work and how your donation is making a difference to the riders and families we serve. This is what it means for you to be part of the Pegasus family.

38. We encourage you to learn more about Pegasus and let you know about other opportunities to partner with us. By default, we issue our newsletter *HoofPrint* periodically to everyone on our mailing list.
39. However, you can change your default preferences for how and when you hear from us by contacting us [See (1) above].

#### Storing your information

40. If storing your personal information is necessary, all hard copy personal information will be held under lock and key with access determined on a category-by-category need-to-know basis.
41. Likewise, all soft copy (electronic) personal information will be password-protected with access determined on a category-by-category need-to-know basis.

#### Disclosing your information

42. Your information will not be used for any purpose for which you would not reasonably expect us to use the information provided.
43. We don't disclose your personal information to other organisations except for our core business purposes; and most importantly, we don't rent or sell your personal information. Nor do we disclose personal information to overseas people or organisations.

#### Sector Campaigns

44. However, to help reach more generous supporters like you, occasionally we collaborate with other charitable organisations on mailings with information that we believe may be of interest to you. These organisations usually allow us to do the same, and by collaborating like this we can reach more people with vital charitable information.

#### Outsourcing

45. Also, to reduce operating and administrative costs, we may securely transfer data to third-party organisations to produce printed material, electronic communications and the like.
  - a. We periodically send mailing and address data to Australia Post for cleansing
  - b. We currently use a cloud-based book-keeping system (eg, Quicken) which retains minimal transaction information for record-keeping purposes

- c. We occasionally use cloud-based data storage facilities (eg, DropBox).
46. These organisations must comply with, and not breach, the Australian Privacy Principles and are bound by tight agreements, which protect your privacy. That generally involves returning all hard-copy data to Pegasus and deleting any hard copy or soft-copy data from their systems.
47. When we tell you about opportunities with other organisations, we will not give your information to them. It will be up to you to contact them directly.
48. Should circumstances change, Pegasus will seek permission from you to disclose personal information prior to disclosure.

#### Keeping your information safe

49. We take all reasonable steps to keep your information safe and secure (whether soft-copy or hard-copy).
50. We commit to de-identify or destroy your information when we no longer need to keep it.

#### Changing this privacy policy

51. From time-to-time, we may be required to it make changes to this policy without notice. Any changes will be reflected on our website and the date last revised will be visible.
52. An up-to-date version of the Pegasus Privacy Policy will be available on the Pegasus website. Upon request, Pegasus will take all reasonable steps to provide a copy of the up-to-date Policy in the form requested.
53. If you have any questions about this document, please contact us [See (1) above].

#### Related Documents

- Social Media Policy
- Australian Privacy Principles
- PCI Data Security Standards
- Participant Protection