



AP-008 - PRIVACY POLICY

Publication Number: AP-008

Version: 1.0

Approved by: Board of Directors

Effective date: August 2026

Review cycle: Every two years, or earlier where required

1. Purpose

Aurora Multicultural Advisory Hub Inc. respects the privacy of every person who engages with our organisation.

This Privacy Policy explains how Aurora collects, holds, uses, discloses, protects and manages personal information.

Aurora is committed to handling personal information responsibly and consistently with the **Privacy Act 1988 (Cth)**, the Australian Privacy Principles and other applicable privacy obligations. Where a particular legal requirement does not apply to Aurora, we will continue to apply recognised privacy standards as a matter of organisational policy and good governance.

The Australian Privacy Principles establish standards relating to the collection, use, disclosure, security, access and correction of personal information. Not-for-profit organisations and charities may have obligations under the Privacy Act depending on their activities and circumstances.

2. Scope

This Policy applies to personal information handled by Aurora in connection with:

- Membership.
- Community programs and events.
- Service enquiries and referrals.
- Donations and fundraising.
- Partnerships.
- Research and evaluation.
- Employment and volunteering.
- Governance activities.
- Complaints and feedback.
- Website use.
- Communications and subscriptions.
- Photography, video and media.
- Contractors and service providers.
- Other lawful organisational activities.



This Policy applies to Aurora's Board members, executives, employees, volunteers, contractors and authorised representatives.

3. What Is Personal Information?

Personal information is information or an opinion about an identified person, or a person who is reasonably identifiable.

Depending on the nature of an interaction with Aurora, personal information may include:

- Name.
- Residential or postal address.
- Email address.
- Telephone number.
- Date of birth.
- Gender or preferred pronouns.
- Country of birth.
- Languages spoken.
- Employment or education information.
- Emergency contact details.
- Membership information.
- Program participation information.
- Donation and payment information.
- Photographs, video or audio recordings.
- Correspondence and enquiries.
- Feedback and complaints.
- Information provided through forms, surveys or applications.
- Website and digital interaction information.

4. Sensitive Information

Sensitive information may include information about a person's:

- Racial or ethnic origin.
- Religious beliefs or affiliations.
- Health or disability.
- Criminal record.
- Sexual orientation.
- Political opinions.
- Professional or trade association membership.
- Biometric information.
- Other matters classified as sensitive information under applicable privacy law.

Aurora will only collect sensitive information where:



AURORA MULTICULTURAL ADVISORY HUB INC

- It is reasonably necessary for a legitimate organisational activity.
- The person has consented.
- Collection is authorised or required by law.
- Another lawful exception applies.

Where sensitive information is collected, Aurora will apply a higher level of care and access control. Under the Australian Privacy Principles, sensitive information is generally collected with consent unless an authorised exception applies.

5. Information About Children and Young People

Aurora may engage children and young people through community, education, leadership, wellbeing or youth-development programs.

When collecting personal information relating to a child or young person, Aurora will:

- Consider the person's age, maturity and circumstances.
- Use clear and accessible explanations.
- Seek consent from a parent, guardian or authorised caregiver where appropriate.
- Collect only information reasonably required.
- Apply additional safeguards to photographs, recordings and sensitive information.
- Restrict access to authorised personnel.
- Prioritise the child or young person's safety and best interests.

Aurora will not knowingly publish identifiable information about a child without appropriate consent or another lawful basis.

6. How We Collect Personal Information

Aurora may collect personal information:

- Directly from the individual.
- Through online or paper forms.
- During program registration.
- During meetings, consultations or community engagement.
- Through membership applications.
- Through employment or volunteer applications.
- Through donations and fundraising activities.
- Through surveys, interviews and evaluations.
- Through complaints or feedback.
- Through email, telephone, social media or website enquiries.
- Through photographs, video or audio recordings where consent has been obtained.
- From a parent, guardian, representative or authorised third party.
- From partner organisations, where authorised.
- From publicly available sources where appropriate and lawful.

0405854086 

info@auroranexus.com.au 

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Aurora will take reasonable steps to explain why information is being collected and how it may be used.

7. Why We Collect Personal Information

Aurora may collect, use and hold personal information to:

- Deliver community programs and activities.
- Register and communicate with participants.
- Assess eligibility for programs or support.
- Respond to enquiries and requests.
- Facilitate referrals and partnerships.
- Manage memberships.
- Process donations and issue receipts.
- Manage volunteers, employees and contractors.
- Conduct community consultation.
- Undertake research, monitoring and evaluation.
- Measure outcomes and improve programs.
- Manage events and attendance.
- Communicate news, opportunities and organisational updates.
- Maintain safety, safeguarding and emergency arrangements.
- Manage complaints, incidents and feedback.
- Meet funding, contractual, legal and regulatory obligations.
- Maintain governance and organisational records.
- Protect Aurora's legitimate interests.
- Prevent fraud, misconduct or misuse of organisational systems.

Aurora will not use personal information for an unrelated purpose unless consent has been obtained or the use is otherwise permitted by law.

8. Collection Notices and Consent

Where practicable, Aurora will provide a collection notice at or before the time personal information is collected.

A collection notice may explain:

- The purpose of collection.
- Whether providing the information is voluntary or required.
- How the information may be used.
- Who it may be disclosed to.
- The consequences of not providing requested information.
- How to access or correct information.
- How to make a privacy complaint.
- Whether information may be stored or disclosed outside Australia.



Consent may be obtained verbally, electronically or in writing depending on the nature and sensitivity of the information.

A person may withdraw consent where consent is the basis for processing, subject to legal, contractual, safety and recordkeeping requirements.

9. Anonymity and Pseudonymity

Where lawful and practicable, individuals may interact with Aurora anonymously or using a pseudonym.

This may not be possible where Aurora must:

- Verify identity.
- Confirm eligibility.
- Maintain participant safety.
- Process a donation or payment.
- Issue an official receipt.
- Meet legal or funding requirements.
- Manage a formal complaint.
- Maintain accurate membership, employment or governance records.

10. Use and Disclosure

Aurora may disclose personal information to:

- Authorised employees and volunteers.
- Board or committee members where required.
- Program delivery partners.
- Government agencies.
- Funding bodies.
- Professional advisers.
- Auditors and insurers.
- Technology and cloud-service providers.
- Payment processors.
- Event and venue providers.
- Researchers or evaluators.
- Health, safety or emergency services.
- Regulatory or law-enforcement bodies.
- Other parties authorised by the individual.
- Other parties where disclosure is required or permitted by law.

Aurora will seek to limit disclosure to the information reasonably required for the relevant purpose.

Where Aurora works with delivery partners, contracts or agreements may include privacy, confidentiality, information-security and safeguarding requirements.



11. Referrals

Aurora may assist individuals to connect with external organisations or services.

Before sharing identifiable information for a referral, Aurora will ordinarily:

- Explain the proposed referral.
- Identify the receiving organisation.
- Obtain consent.
- Share only relevant information.
- Record the referral where appropriate.

Consent may not be required where disclosure is authorised or required by law, or where urgent action is necessary to protect health, safety or wellbeing.

Aurora is not responsible for the privacy practices of an independent external organisation. Individuals should review the receiving organisation's privacy information where appropriate.

12. Research, Evaluation and Reporting

Aurora may use information to evaluate programs, measure outcomes, support research and report to funders or partners.

Where practicable, information used for reporting, research or publication will be:

- Aggregated.
- De-identified.
- Limited to what is necessary.
- Protected against unreasonable re-identification risk.

Identifiable case studies, testimonials, photographs or personal stories will only be published with appropriate consent or another lawful authority.

13. Photographs, Video and Audio

Aurora may photograph, film or record programs, events and community activities.

Aurora will take reasonable steps to:

- Inform participants when recording is taking place.
- Obtain appropriate consent.
- Explain how material may be used.
- Apply additional protections for children and vulnerable participants.
- Respect reasonable requests not to be photographed or recorded.
- Avoid using material in a misleading, harmful or disrespectful way.



Approved material may be used in:

- Reports.
- Websites.
- Social media.
- Funding proposals.
- Educational resources.
- Presentations.
- Promotional materials.
- Public accountability publications.

Consent may be withdrawn for future use where reasonably practicable, but withdrawal may not affect material already lawfully published, distributed or incorporated into completed publications.

14. Donations and Payments

Aurora may collect information required to process donations, event payments or other transactions.

Payment-card information may be processed directly by an authorised third-party payment provider. Aurora will not ordinarily retain complete payment-card details unless this is necessary, lawful and supported by appropriate security controls.

Aurora may retain:

- Donor name.
- Contact details.
- Donation amount.
- Transaction date.
- Receipt information.
- Communication preferences.
- Information required for financial reporting and regulatory compliance.

Donors may request anonymity in public acknowledgements.

15. Communications and Direct Marketing

Aurora may use contact information to communicate about:

- Programs.
- Events.
- Publications.
- Volunteering.
- Donations.
- Partnerships.
- Community opportunities.
- Organisational news.



Where required, Aurora will obtain consent before sending promotional communications.

Electronic communications will provide a reasonable method to unsubscribe or update preferences.

Aurora will not sell personal information to advertisers or unrelated third parties.

16. Website Information

When a person visits Aurora's website, certain technical information may be collected automatically, including:

- Internet Protocol address.
- Browser type.
- Device type.
- Operating system.
- Pages visited.
- Date and time of access.
- Referring website.
- General location information.
- Website interaction and performance data.

This information may be used to:

- Operate and secure the website.
- Understand how visitors use the website.
- Improve accessibility and content.
- Diagnose technical issues.
- Prevent misuse.
- Measure communications performance.

Aurora will not attempt to identify a website visitor from technical information unless reasonably necessary for security, investigation or legal purposes.

17. Cookies and Analytics

Aurora's website may use cookies and similar technologies.

Cookies may support:

- Website functionality.
- User preferences.
- Security.
- Performance monitoring.
- Traffic analysis.
- Form operation.
- Donation processing.
- Embedded services.



Visitors may be able to restrict or delete cookies through browser settings. Some website functions may not operate correctly when cookies are disabled.

Further information may be provided through Aurora's Cookie Policy or website consent settings.

18. Social Media and External Platforms

Aurora may use social media and other third-party digital platforms.

Information provided through those platforms may also be handled under the platform provider's privacy terms.

Aurora recommends that users:

- Review relevant privacy settings.
- Avoid posting sensitive personal information publicly.
- Use private communication channels for confidential enquiries.
- Contact Aurora directly where a matter involves safety, privacy or a formal complaint.

Aurora is not responsible for the privacy practices of independent external platforms.

19. Overseas Storage and Disclosure

Some technology providers, cloud platforms, professional services or delivery partners may store or process information outside Australia.

Where personal information may be disclosed or made accessible overseas, Aurora will take reasonable steps appropriate to the circumstances, which may include:

- Assessing the provider.
- Reviewing contractual safeguards.
- Limiting the information disclosed.
- Applying access controls.
- Informing individuals where required.
- Obtaining consent where appropriate.

The countries involved may vary depending on the service provider and technology used.

20. Information Security

Aurora takes reasonable steps to protect personal information against:

- Misuse.
- Interference.
- Loss.
- Unauthorised access.
- Unauthorised modification.
- Unauthorised disclosure.



Security measures may include:

- Role-based access controls.
- Password and authentication requirements.
- Secure cloud storage.
- Device protection.
- Staff and volunteer confidentiality obligations.
- Privacy and security training.
- Restricted access to sensitive records.
- Secure disposal.
- Incident-response procedures.
- Service-provider due diligence.
- Backup and recovery arrangements.

No information system is completely secure. Aurora will continue to review and improve its controls according to risk, technology and organisational development.

21. Retention and Disposal

Aurora will retain personal information only for as long as reasonably required for:

- The purpose for which it was collected.
- Program administration.
- Safety and safeguarding.
- Financial reporting.
- Legal and regulatory obligations.
- Contractual requirements.
- Complaints or dispute management.
- Historical or organisational records.
- Legitimate research or evaluation.

When personal information is no longer required, Aurora will take reasonable steps to:

- Securely destroy it.
- Delete it.
- De-identify it.
- Transfer it to an authorised archival system where lawful.

Aurora recognises that unnecessary retention increases privacy and data-breach risk.

22. Access to Personal Information

A person may request access to personal information Aurora holds about them.

Requests should include enough information to allow Aurora to:

- Verify identity.



- Locate the relevant records.
- Understand the scope of the request.

Aurora will respond within a reasonable period.

Access may be refused or limited where permitted by law, including where access would:

- Unreasonably affect another person's privacy.
- Reveal confidential information relating to another person.
- Create a serious safety risk.
- Prejudice an investigation.
- Breach legal privilege.
- Be unlawful.
- Be frivolous or vexatious.

Where access is refused, Aurora will ordinarily explain the reason and available complaint options.

23. Correction of Personal Information

Individuals may ask Aurora to correct personal information that is:

- Inaccurate.
- Out of date.
- Incomplete.
- Irrelevant.
- Misleading.

Aurora will take reasonable steps to correct verified information.

Where Aurora does not make the requested correction, the individual may request that a statement explaining their position be associated with the record where appropriate.

24. Data Breaches

A data breach may occur where personal information is lost, accessed without authorisation or disclosed without authorisation.

Aurora will respond to suspected data breaches by:

1. Containing the incident.
2. Assessing the circumstances and potential harm.
3. Notifying affected people and regulators where required.
4. Reviewing the incident and strengthening controls.



These stages reflect the OAIC's recommended response sequence of contain, assess, notify and review.

Where Aurora is subject to the Notifiable Data Breaches scheme, it will notify affected individuals and the Office of the Australian Information Commissioner when an eligible breach is likely to result in serious harm.

25. Privacy Complaints

A person who believes Aurora has mishandled their personal information may submit a privacy complaint.

A complaint should include:

- The person's name and contact details.
- A description of the concern.
- Relevant dates or interactions.
- The outcome being sought.
- Supporting information where available.

Aurora will:

- Acknowledge the complaint.
- Assess the issues.
- Seek further information where required.
- Conduct a fair review.
- Protect confidentiality where practicable.
- Provide a written response.
- Explain any corrective action or review options.

Aurora will not disadvantage a person for making a complaint in good faith.

26. External Review

Where a person is dissatisfied with Aurora's response, they may seek independent advice or contact an appropriate privacy regulator.

Where the Privacy Act applies, complaints may be made to the **Office of the Australian Information Commissioner** after giving Aurora a reasonable opportunity to respond.



27. Responsibilities

Board of Directors

- The Board oversees Aurora's approach to privacy, information governance and material privacy risk.

Secretary and Chief Operating Officer

- The Secretary and Chief Operating Officer supports organisational privacy governance, systems, compliance and incident management.

Executive Leadership Team

- The Executive Leadership Team ensures that privacy requirements are integrated into programs, operations and partnerships.

Employees and Volunteers

Employees and volunteers must:

- Handle personal information only for authorised purposes.
- Follow privacy and information-security requirements.
- Protect confidential information.
- Report suspected breaches.
- Complete required training.

Contractors and Partners

- Contractors and partners must comply with contractual and legal privacy obligations applicable to their work with Aurora.

28. Changes to This Policy

Aurora may update this Privacy Policy to reflect:

- Legislative or regulatory change.
- New programs or services.
- Technology changes.
- Organisational growth.
- Revised privacy practices.
- Risk or assurance findings.
- Community and stakeholder feedback.

The current version will be published on Aurora's website.

Material changes may also be communicated directly where appropriate.



29. Contact Aurora

Questions, access requests, correction requests and privacy complaints may be directed to:

Privacy Contact

Aurora Multicultural Advisory Hub Inc.

Email: info@auroramulticultural.org.au

Website: www.auroramulticultural.org.au

Location: Melbourne, Victoria, Australia

Please include “**Privacy**” in the email subject line.

Privacy Commitment

Aurora recognises that personal information is entrusted to us by community members, donors, employees, volunteers, partners and supporters.

We will collect only what we reasonably need, use information responsibly, protect it carefully and remain accountable for how it is managed.

Publication Information

Publication Number: AP-008

Title: *Privacy Policy*

Version: 1.0

Effective date: August 2026

Publisher: Aurora Multicultural Advisory Hub Inc.

Website: www.auroramulticultural.org.au

Email: info@auroramulticultural.org.au

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