



## What's in This Document?

This document contains the following statements:  
MD app Privacy Policy

### In app -> Privacy

This is the brief wording to be displayed in the "Privacy Policy" menu item in the App and on the Ministry Development Portal

### App Store -> Description

This is the wording to be displayed in the description of the Apps in both Apple and Google stores

## 1. About This App

### 1.1 What Is MD/ MDLite ?

MD/ MDLite provides a convenient platform for Ministry Leaders to create a profile, build and share ministry reports, track their ministry progression, seek feedback, access resources, and develop themselves and other leaders. The Ministry Development Portal (MD) is a web interface, and MDLite is a mobile application that is integrated with MD. Together they provides ministry support and development for ministry leaders, and administrative oversight for Church Administrators. For the purpose of this document, the term "MD" shall refer to MD, MDLite, or a combination of both.

### 1.2 Who Owns MD

MD is provided and owned by the South Pacific Division of the Seventh-day Adventist Church, ABN 59 093 117 689, (referred to as "Seventh-day Adventist Church (SPD) Ltd", "SPD", "SPD Ltd", "we," "us," and/or "our"). MD exists to support, resource, develop and provide leadership and reporting tools for Ministry Leaders (lay and employed) of the Seventh-day Adventist Church, its associate entities, and engaged in the Defence Force. These associated entities include churches, schools, Aged Care Residences, Conferences, Missions, Unions, Union Missions, and Division/s. More information on the SPD is available at our website <https://adventistchurch.com>

### 1.3 Access to MD

Access to MD is by invitation only from a member of the Ministerial Association. Access to MD is by invitation only. As an employee, invitations are issued by Conference, Union or Division Ministerial Secretaries who oversee the day to day running of the Ministerial Association. Lay leaders may be invited by the pastor of the local church in which they lead.

## 2. About This Privacy Policy

This Policy describes how SPD, through MD, will discharge its obligations under the Privacy Act 1988 (Cth) and various state and territory privacy acts, collectively referred to as Privacy Laws. The Privacy Laws include the Privacy Principles, described as Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth) which apply to the use of personal information by the SPD. Policy that covers the broader business of the organisation it can be found at <https://adventistchurch.com/privacy/>.

The Australian Privacy Principles are located at: <https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-quick-reference/>

This privacy policy details how the SPD meets its obligations to manage personal information in accordance with the Privacy Laws. It sets out how SPD collects, processes, holds, discloses and uses personal information of people who download, access and use MD and any associated website or software (collectively referred to as MD).

### 3. Changes to This Policy

Please be aware that we may change this Privacy Policy in the future. If we do, we will notify you via MD. In our sole discretion and all modifications will be effective immediately upon our posting of the modifications within the MD. If you don't agree with the changes, then do not use MD. If you continue to use MD, the changed policy will apply from the time it was changed.

### 4. Information This App Collects About You

#### 4.1 Why Your Personal Information Is Collected

SPD collects sensitive data by virtue of its affiliation with a religious organisation. In pursuit of the core activities of ministry development, facilitating online forms, communication and carrying out administrative functions, MD accumulates a large amount of personal information concerning ministry leaders, lay users and other persons and is required to hold certain records of factual information, both for internal use and to meet its statutory obligations. The collection, storage and processing of your data is required to support you in your employment, assists your employer to comply with legal obligations; and is in the interest of supporting, developing and resourcing you in your ministry.

#### 4.2 How We Collect Your Personal Information

SPD collects personal information from you in a variety of ways, including when you interact with us electronically or in person, when you use MD and when we provide our services to you. We may also receive personal information from MD or from third parties. If we do, we will protect it as set out in this Privacy Policy.

#### 4.2 Your Profile and Preference Information

You may provide and manage your own basic profile and preference information such as

- your name, phone number, permanent home address
- family details, education history
- ministry experience, education and training, leadership experience
- reflections on, and preferences for ministry settings
- documents that you have uploaded (eg. your CV, qualifications etc)

By using the Profile and Preferences pages, you give consent to your data being used as set out in this policy, and assume responsibility for ensuring that your information is entered correctly. Profile and Preference information can be added by you for the purpose of sharing this information with church administrators throughout the South Pacific Division and its territories. Such administrators include Union, Union Mission and Conference Administrators (Presidents, Secretaries, Ministerial Association Secretaries/ and similar), serving at SPD Ltd, the Australian Union Conference Ltd, the New Zealand and Pacific Union Conference Ltd and the Trans Pacific Union Conference Mission, and associated Conferences and Missions. This is also made clear to you within the app at the top of the Profile and Preferences pages.

### 4.3 Ministry Information Records

SPD and its associated entities (Unions, Conferences, Union Missions, Missions as appropriate) may keep your information records for its compliance, as a record of employment history, and as a record of its investment in your ministry development. Keeping a record of your information may be required by law (such as State records laws).

Ministry/ information records may relate to:

- Development plans and progress (Auxano Plans), Resources and progress through resources. This includes reading, viewing, listening, online courses, seminar resources as well as mentors.
- Plans, progress and comments via Ministry Reports
- Feedback on your ministry via a Review and Evaluation cycle, provided by yourself, your Reviewers, Supervisors, and Administrative/ Ministerial Staff.
- Induction and Intervention Plans
- Your login attempts (successful and failed)
- Academic performance and industry qualifications (e.g. certificates, degrees, placements), examination and assessments.
- Applications for and awards of Development funding assistance.
- Qualifications and status for specific courses (e.g. possession of Blue Card, Immunisation, First Aid)
- Login attempts
- Other related matters

### 4.4 Other Personal Information Platforms

Additionally, information stored in Membership online (Entity ID) and ACMS membership databases, MyAdventist, and other platforms is also collected, as well as any other information you provide while interacting with us while using the app.

### 4.5 Use of Cookies

We use 'cookies' (small files) to store information provided by your browser when you visit our website. This includes the date and time of your visit, the pages accessed and any documents downloaded. We also use cookies to measure demographic usage patterns to determine which areas of our website have been visited.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

## 5. We Respect Your Privacy

### 5.1 What You Can Expect From Us

We recognise that all portal users, both past and present, are entitled to a legitimate expectation that we will collect, store, manage, use and disclose all personal information held about them in accordance with all relevant legislation, guidelines and standards.

### 5.2 We Adhere to Australian Privacy Principles

The SPD respects your right to privacy and is committed to safeguarding the privacy of MD users. We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). This policy sets out how we collect and treat your personal information.

### 5.3 Definition of Personal Information

"Personal information" is information we hold which is identifiable as being about you as defined in the Privacy Act, 1988 (Cth).

## 6. How Your Personal Information Is Stored

### 6.1 Periodic Reset of Your Personal Information

Your profile information will be deleted 18 months from your last update. MD will invite you to update your profile information each year to keep it current, and to avoid your profile information being lost.

### 6.2 Hosting and Data Security Measures

SPD is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it to the fullest extent possible from misuse, interference, loss and unauthorised access, modification and disclosure.

MD manages the storage of your information in encrypted form using Amazon Web Services (AWS). AWS is subject to both Australian and overseas laws that may require the disclosure of your information (in limited circumstances) to government authorities here and overseas.

SPD assures you that:

- SPD will encrypt your information both in transit and when stored on AWS to make it safer from external attack. Encryption is designed to make data unreadable - and to make it readable again only with the right encryption key. The encryption keys are with SPD.
- AWS does not have access to, nor does it use, your information for any purpose other than providing the services required for the operation of MD, and to maintain their own services; and
- SPD requests all of its service providers (including AWS) to agree to use personal information only for the purpose of providing and maintaining their services.

For more information on the security measures employed by MD, please refer to the document "Security layers and Servers employed by the MD Portal MD" available under the documents tab within the app.

### 6.3 Your Responsibilities re Data Storage

Whilst every effort has been taken to ensure your personal information remains in Australia, there remains a risk that your personal information collected by the app may be stored in another country through your own phone's cloud backup service. (eg. iCloud backup). SPD cannot guarantee the sovereignty of your personal information if you use backup services that physically store data in other countries. It is recommended that you review your phone backup process and conduct your own due diligence on where and how your personal information is stored by your backup service provider.

### 6.4 Data Loss

SPD is responsible for handling your personal information in accordance with the *Information Privacy Act 2009*. But, while SPD will exercise reasonable care, SPD is not responsible for any loss as a result of your use, or your inability to use MD. This includes any loss, damage, cost or expense, including loss of profits or income, loss or denial of opportunity, loss of use and loss of data.

## 7. Use of Your Personal Information

### 7.1 Your Data Is Used To Contact You

SPD may contact you by a variety of measures including, but not limited to telephone, email, sms, portal notifications or mail.

### 7.2 Your Data Is Used To Improve Your Experience Within the App

SPD may use personal information collected from you to auto-populate forms, generate Competency Review reports, and provide you with information, updates and our services. We may also make you aware of new and additional features, resources, products, services and opportunities available to you. We may use your personal information to improve our products and services and better understand your needs.

### 7.3 Your Profile and Preferences Are Shared With Potential Future Employers

A feature of MD is that the data you have entered in your profile and preferences page/s is available in real time to staffing committees and Administrative users of MD at the Conference, Union and Division level, within the South Pacific Region.

### 7.4 MD Mirrors Real World Permissions

Your data is used in a way that mirrors established permissions within the Adventist Church. eg. While your employing Conference can see your Ministry Reports and Competency Reviews, other Conferences cannot. For more information on access to your data, see the document "MD Portal Users and their roles" available within MD or available on request from the MD Administrator at [support@md.adventist.org.au](mailto:support@md.adventist.org.au).

## 8. Disclosure of Your Personal Information

### 8.1 Administrators Are Required To Abide to the Processes of MD

Administrative users of the Portal are required at all times abide by the processes set out within the MD Ministry Leaders' Handbook, the MD Administrators' Handbook, and the MD Ministry Progression Manual and the MD Portal Manual/s. Data shall not be shared with any other, except as provided for within the processes outlined therein. These documents are available on request from the MD Administrator at [support@md.adventist.org.au](mailto:support@md.adventist.org.au).

### 8.2 Disclosure of Your Information to Others

We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Policy. Subject to clauses 8.3 and 8.4 below, Personal information is only supplied to a third party when it is required for the delivery of our services.

### 8.3 Disclosure of Information To Comply With a Legal Requirement

We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.

## 8.4 Disclosure of Information To Protect Intellectual Property, Entities

We may also use your personal information to protect the copyright, trademarks, legal rights, property or safety of SPD, MD, entities of the Seventh-day Adventist Church, Adventist Schools Australia, their customers or third parties.

## 8.5 Transfer of Information to Entities Outside Australia

As set out in clause 4.3, Your profile and preference information is available to church administrators serving/ located in countries outside of Australia. These entities are obligated to comply with the same level of privacy as is required in Australia.

## 8.6 Change of Governance

If there is a change of governance of SPD Ltd or of MD, or a sale or transfer of associated assets to another entity within the Seventh-day Adventist Church, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser or transferee under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

## 8.7 Your Consent to This Privacy Policy

By entering your personal information within MD, you consent to the terms of this Privacy Policy and the types of disclosure covered by this Policy. Where we disclose your personal information to third parties, we will request that the third party follow this Policy regarding handling your personal information.

## 8.8 Disclaimer

Even as we take every measure to safeguard against unauthorised disclosures of information, it is important to remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee with absolute certainty that your information will not be used in a manner contrary to Australian Privacy Laws.

# 9. Access to Your Personal Information

## 9.1 Managing Your Information

Your information is available to you and can be updated by you within MD using your login credentials provided that your employment status with the church has not changed and is not under review.

## 9.2 Circumstances When Your Access to Information May Be Removed

We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act.

## 10. Support for Correction of Your Data

### 10.1 Support for Managing Your Data

Technical support is always available from within MD. If you believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, and you are unable to correct this yourself, please email us at [support@md.adventist.org.au](mailto:support@md.adventist.org.au).

### 10.2 Questions or Concerns

You may contact SPD Ltd at any time if you have any questions or concerns about this privacy policy or how your personal information has been handled. Our contact details are set out at below.

If you have contacted us and your question or concern has not been able to be resolved to your satisfaction, you may make a complaint. We take complaints very seriously and will respond as soon as possible after receiving written notice of your complaint. Contact details for SPD Limited are set out below.

Complaints must:

- be in writing, addressed to the MD App Administrator at SPD Ltd
- include a return address
- be lodged within six months of the complainant becoming aware of the conduct that has given rise to the complaint

- Email        [support@md.adventist.org.au](mailto:support@md.adventist.org.au)
- Phone        +61 2 9847 3333 (ask for the MD administrator)
- Post         148 Fox Valley Road (locked Bag 2014), Wahroonga, NSW, 2076, AUSTRALIA.

If your concern/ complaint is not handled to your satisfaction by the position above, then you may appeal to the Privacy Officer.

If you believe SPD Limited may have breached the Australian Privacy Principles or your complaint has not been resolved to your satisfaction, you are entitled to make a complaint to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992. Full contact details for the Office of the Australian Information Commissioner can be found online at [www.oaic.gov.au](http://www.oaic.gov.au).

This Policy was last updated 08 October 2022