

## PRIVACY AND DATA PROTECTION POLICY

<b>Approved By:</b>	Transform Global Ltd Board	<b>Effective Date:</b>	26 March 2026
<b>Policy Owner</b>	CEO	<b>Policy Delegate:</b>	
<b>Last Review Date:</b>	26 March 2026	<b>Next Review Date:</b>	26 March 2029
<b>Version Number:</b>	1.0	<input checked="" type="checkbox"/> Internal or <input checked="" type="checkbox"/> External	

### 1. PURPOSE

Transform Global Ltd is committed to protecting personal information and respecting the privacy of all individuals connected to its work. This policy sets out how Transform collects, uses, stores, discloses, and protects personal information.

The purpose of this policy is to:

- Protect the privacy of children, vulnerable adults, staff, volunteers, sponsors, and donors.
- Ensure personal information is handled lawfully and securely.
- Meet Australian Privacy Act 1988 and Australian Privacy Principles requirements.
- Reflect good practice for international operations in Cambodia.
- Reduce the risk of misuse, loss, or unauthorised access to personal data.

### 2. SCOPE

This policy applies to all personal information handled by Transform, including information relating to:

- Children and vulnerable adults engaged in programs.
- Parents and caregivers.
- Staff, volunteers, sponsors and visitors.
- Donors and supporters.
- Contractors, suppliers and partners.

This policy applies to:

- Information in electronic and paper form.
- Information collected in Australia and Cambodia.
- Online systems, databases, and cloud services.

### 3. PRINCIPLES

Transform manages personal information in line with the following principles:

- Only collect information that is necessary.
- Use information only for legitimate organisational purposes.
- Store information securely.
- Limit access to authorised people.
- Be transparent about how information is used.
- Respond promptly to privacy concerns or breaches.

#### 4. DEFINITIONS

**Personal information:** Information or an opinion that identifies, or could reasonably identify, an individual.

**Sensitive information:** Includes health information, criminal history, biometric data, and information about children.

**Privacy breach:** Unauthorised access to, disclosure of, or loss of personal information.

#### 5. COLLECTION OF PERSONAL INFORMATION

Transform collects personal information where it is reasonably necessary to:

- Deliver programs and services.
- Protect children and vulnerable adults.
- Manage staff, volunteers, and visitors.
- Communicate with donors and supporters.
- Meet legal and regulatory obligations.

Where possible, information is collected directly from the individual or their authorised representative.

#### 6. USE AND DISCLOSURE

Personal information is used and disclosed only for the purpose it was collected, or where:

- Consent has been provided.
- Required or authorised by law.
- Necessary to prevent serious harm.
- Required for safeguarding, investigation, or reporting.

Information about children and vulnerable adults is handled with heightened care.

## **7. DATA STORAGE AND SECURITY**

Transform takes reasonable steps to protect personal information from:

- Misuse or interference.
- Loss.
- Unauthorised access, modification, or disclosure.

Security measures include:

- Secure physical storage.
- Password protection and access controls.
- Restricted access based on role.
- Secure cloud and IT systems.

## **8. OVERSEAS DISCLOSURE**

Personal information may be stored or accessed in Australia or Cambodia.

Transform takes reasonable steps to ensure overseas handling of personal information is consistent with Australian privacy standards.

## **9. ACCESS AND CORRECTION**

Individuals may request access to, or correction of, their personal information.

Requests should be made to Transform in writing.

Access may be refused where permitted by law, including where it may compromise safeguarding or investigations.

## **10. PRIVACY BREACHES**

All actual or suspected privacy breaches must be reported immediately.

Transform will:

- Contain and assess the breach.
- Notify affected individuals where required.
- Notify the Office of the Australian Information Commissioner where required.

- Take steps to prevent recurrence.

## 11. RESPONSIBILITIES

Board of Directors:

- Oversees privacy and data protection risks.

Chief Executive Officer:

- Accountable for compliance with this policy.
- Ensures appropriate systems and controls are in place.

Country Director:

- Responsible for local implementation in Cambodia.
- Ensures staff understand and comply with privacy requirements.
- Escalates serious breaches to the CEO.

All staff, volunteers, and representatives:

- Comply with this policy.
- Protect personal information.
- Report privacy concerns or breaches immediately.

## 12. COMPLAINTS

Privacy concerns or complaints may be raised through:

- Line management.
- The Country Director.
- The CEO.
- The complaints email: [complaints@transformcambodia.com](mailto:complaints@transformcambodia.com).

Complaints will be handled in line with the Complaints and Whistleblower Policy.

## 13. POLICY REVIEW

This policy is reviewed every three years, or earlier if required due to:

- Legislative change.
- Serious privacy incidents.
- Organisational change.

All changes require Board approval.

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Approved by the Board of Transform Global Ltd

Review cycle: Three years

END

VERSION CONTROL			
Original Version:	1.0	Version Date:	26 March 2026
Previous Version Number:		Version Date:	
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