

Privacy Compliance Statement

GHD Foundation Privacy Policy

This Privacy Policy outlines how the companies which constitute the GHD Foundation¹ (collectively “GHD Foundation”) collects, uses and stores personal information in the course of its operations from donors, employees, applicants for employment, contractors, clients, suppliers, and other individuals (referred to as “you” or “your” in this Privacy Policy).

GHD Foundation respects and upholds your right to privacy protection. GHD Foundation recognises applicable local laws and regulations and relevant data protection standards in respect of the collection, use, disclosure storage and transfer of personal information from individuals.

This Privacy Policy details the practices we have adopted to protect your privacy so that you can understand how we manage your “personal information”, any “personally identifiable information” or “personal data” (as defined under the European Union's General Data Protection Regulation or “GDPR”) (together collectively referred to as “personal information” in this Privacy Policy), you entrust to us.

This Privacy Policy also sets out how you can contact us in relation to your personal information and, if requested by you, opt-out of this Privacy Policy, limit the use of, or amend, any personal information we may have about you.

By providing us with personal information about yourself through our website, any GHD Foundation webpage or otherwise, you consent to the collection, use, disclosure, storage and transfer of that personal information as set out in this Policy. If at any time, you wish to withdraw your consent to the collection, use, disclosure, storage and transfer of your personal information in accordance with our Privacy Policy, you may opt-out by contacting us (refer to the Contact Us information below) or by immediately ceasing to provide any further personal information about yourself to GHD Foundation via its website or otherwise.

COVID-19 Response

In the interest of discharging our duty of care to invitees to our premises GHD Foundation may, with respect to COVID-19, and subject to the requirements of applicable law, collect and use sensitive personal information from our employees, contractors and invitees including but not limited to vaccine status, temperature, whether they have flu-like or other associated symptoms, have been in contact with anyone infected with COVID-19, or travelled to a high-risk area. Personal information reasonably necessary for the purpose of preventing or managing COVID-19 in the workplace and meeting legislative and regulatory requirements and other public health directives and orders may be collected, used, stored or disclosed.

This personal information will be managed in accordance with this policy and any applicable legislative requirements and it will only be disclosed to the persons who need to have access to such personal information for the purposes for which it was collected. The primary purpose for collection of this additional information is to ensure that necessary precautions are adopted in relation to that individual and any other individuals, to meet legislative and regulatory requirements and other public health directives and orders and where necessary, to secure and satisfy commercial arrangements with third parties.

[Under most jurisdictions an exemption from any requirement for consent to collect and use personal information is permitted in circumstances of serious threat to health or safety of an individual. GHD Foundation will comply with specific COVID-19 mandatory guidance issued by a relevant regulator].

¹ GHD Foundation" is a reference to the three separate registered charitable companies which together constitute the GHD Foundation and are registered as follows : United States (EIN 86-1440814); Australia (ABN [12 645 424 862](#)); and Canada (Registration No. [796286144 RR 0001](#))

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1. When do we collect and hold personal information?

Personal information is any information that can be used to identify you (either directly or indirectly), and may be collected directly from you, by a third party you have given consent to disclosing your personal information, or by a credit agency, government or statutory body.

We collect and store personal information (including names, telephone numbers, address, email address, occupation, education and qualifications, etc) in a range of contexts, such as:

- when entering into relationships with new donors or potential donors;
- when engaging with other charitable bodies or organisations to further our objectives;
- when individuals apply for employment or other opportunities with us;
- when individuals register online for access to secure sites or collaboration services hosted by GHD Foundation or third parties on behalf of GHD Foundation.

2. What do we do with personal information?

We may use your personal information:

- to enable us to deliver our programs to beneficiaries;
- to communicate information to you about our programs and initiatives that may interest you;
- for our internal administrative, planning, product development, marketing and research requirements;
- to consider the suitability of applicants for employment with us, which may be processed by third parties engaged to undertake pre-employment screening services;
- to complete transactions you have authorised and manage your support;
- for research purposes to assist us to better understand and connect with our supporters or
- for any other reason you allow or consent to.

As an example, one of the key objectives of GHD Foundation's website is to provide information about who we are and what we do. We may collect personal information to update our website and in order to provide relevant information about GHD Foundation, our programs, or our capabilities in a variety of contexts.

3. Reasons we may share or disclose your personal information

Whilst at all times complying with this Privacy Policy and having primary regard for the protection of your personal information, GHD Foundation may share or disclose your personal information in a number of circumstances, such as:

- between the GHD Foundation entities;
- when passing information between, credit, law enforcement, and other government and regulatory agencies, and professional services providers, if required;
- as necessary, to complete any transaction you have authorised;
- with members of the GHD group of companies² who may be assisting the GHD Foundation and need to know for the purpose for which the information was provided; or
- otherwise as you may consent.

Some examples:

- As part of the provision of our services, we may outsource some of our functions to third parties, which may involve the disclosure of your personal information. These third parties will not be authorised to use your personal information for any purpose or purposes other than that for which your personal information is disclosed.
- GHD Foundation is a global organisation. We may disclose your personal information to GHD Foundation offices in countries outside the country in which it was collected, if it is necessary for one of the purposes the information has been disclosed to us.
- GHD Foundation technology support is provided from the Philippines and, for that purpose, your personal information may be accessed remotely from the Philippines.

If we disclose your personal information to an office in a country other than the country in which it is collected, we will take all reasonable steps to ensure a level of data protection at least as protective of that required in the European Union's GDPR, which offers high levels of personal information protection.

We will also require any GHD Foundation agents who are outside your jurisdiction and to whom we transfer information about you to ensure a similar level of data protection as required by the European Union's GDPR when it comes to protecting your personal information. GHD Foundation will not use, share or disclose your personal information that was collected for a particular purpose for another secondary purpose (which you would not reasonably expect) without your consent unless we are required or authorised by law, or compelled for legitimate legal reasons by government authority or law enforcement agency. GHD Foundation must seek additional consent from you to use or retain your personal information other than as set out in this Privacy Policy and you have the choice to opt-out at all times by contacting us (as outlined below).

Your personal information is never shared, sold or rented except if required by law or with your consent.

² The GHD group of companies includes GHD Group Limited and any other company carrying on business that is part of the GHD group of companies

4. Marketing and communications

GHD Foundation delivers dynamic programs. For this reason, we may send marketing material or communicate information that we think may be relevant or of interest to you including about our latest programs.

At any time, you may opt-out of receiving any communications from us or change your marketing communication preferences.

Electronic marketing or communications material will have an “unsubscribe” link or contain instructions allowing you to opt-out or change your preferences. Alternatively, you can contact us directly about our marketing and communications by using the contact details below.

4.1 California residents and direct marketing

California residents are entitled once a year, free of charge, to request and obtain certain information regarding GHD Foundation’s disclosure of certain categories of personal information to third parties for their direct marketing purposes in the preceding calendar year. It should be noted that GHD Foundation does not disclose personal information to third parties for direct marketing purposes, regardless of jurisdiction.

5. How do we use "cookies", "log files", data analytics and other similar technology?

5.1 Cookies

The GHD Foundation website located at www.ghdfoundation.org (a website which is operated by a third party) use cookies for collecting information.

A “cookie” is a small data file that is placed on your computer or other device to allow a website to recognise you as a user when you return to the website using the same computer and web browser, either for the duration of your visit (using a ‘session cookie’) or for repeat visits (a ‘persistent cookie’). Other similar files work in the same way and we use the word “cookie” in this Privacy Policy to refer to all files that collect information in this way.

You may disable cookies by changing the settings on your browser – please refer to your browser options or instructional material. If you disable cookies, it is likely to affect how your browser works. For more information on cookies visit: www.allaboutcookies.org.

5.2 Log files

The GHD Foundation located at www.ghdfoundation.org (a website which is operated by a third party) uses log files on a limited basis to record appropriate access to some project information by registered users.

A log file or log is the automatically produced and time-stamped documentation of events relevant to a particular system. From the server’s log files, an administrator can identify numbers of visitors, the domains from which they are visiting, the number of requests for each page and usage patterns.

5.3 Data analytics (such as Google Analytics™) and other technologies

The GHD Foundation website located at www.ghdfoundation.org (a website which is operated by a third party) uses log files and Google Analytics™.

We may automatically log IP addresses (i.e., the electronic addresses of computers connected to the Internet) to analyse trends, administer the site, track user movements, and gather broad demographic information.

We may collect and use data relating to the geographical location of your computer or mobile internet device. We use this to provide country and region-specific information.

This information collected is not “personal information” and you cannot be identified from its collection. It is only used to assist GHD Foundation in optimising the content and effectiveness of our website.

6. Links to third party websites

Websites operated on our behalf may contain links to other websites that are operated by third parties. Whilst GHD Foundation tries to link only websites that share our high standards and respect for privacy, we make no representations or warranties as to the privacy practices of any third-party site and cannot be responsible for the privacy policies, content or security of other sites. This Privacy Policy does not apply to, or cover, linked websites.

If you access or share information to websites linked to our website, the operators of those websites may collect your information in accordance with their own privacy policies that may differ to ours. You should review the privacy, “cookie” and other policies displayed on these websites to find out how your personal information may be used and stored.

7. Data security

The website is hosted by a third-party provider. We are satisfied that they have taken reasonable steps and applied appropriate technical measures to maintain the security of any personal information we receive from you and protect it from loss, misuse, and unauthorised access, disclosure or modification.

We will only keep your personal information when we consider it necessary for one of the purposes for which you have disclosed it. If it is no longer necessary to keep your personal information, we will take reasonable steps to destroy or de-identify your personal information safely, if required.

8. How can you access and correct information?

You may have a right in certain circumstances to request a copy of the personal information about you we may hold, request the removal of personal information from our records and to have inaccurate information changed or out-of-date information amended. For example, persons in the European Union, have a right under the GDPR to request the deletion or erasure of their personal information, where that information is no longer required for the purpose for which it was collected.

Please submit a request to the GHD Foundation via the Contact Us link on our website, and we will respond to your request as required by applicable law.

For security reasons, we will ask you to verify your identity to ensure that we do not give information to the wrong person or change or remove your personal information without your express consent.

If there is no applicable legal or regulatory requirement for GHD Foundation to respond to your request, GHD Foundation will respond at its discretion.

9. Children’s information

GHD Foundation websites and collaboration services hosted by GHD Foundation or third parties on behalf of GHD Foundation are intended to be used by adults and corporate entities interested in GHD Foundation

and are not directed to children. To the extent GHD was to collect any personal information from children under 13 years of age, it would be limited to collection with a parent or guardian's consent.

10. Data breach notification

In the highly unlikely event of a data breach, GHD Foundation will act promptly to comply with applicable local laws. As required by applicable laws where it is reasonably foreseeable that an individual will suffer serious harm as a result of an unauthorized access to or disclosure of personal information and GHD Foundation has not been able to prevent the risk of serious harm with remedial action, the relevant regulatory body and, where possible, the affected individual will be contacted without undue delay. This notification shall include such things as the nature of the breach, the personal information possibly involved and measures taken to address the breach (including to reduce the harm of negative consequences) and the contact details from whom affected individuals can obtain further information

11. Future changes to our Privacy Policy

Your privacy is important to us and GHD Foundation is committed to our privacy practices being up-to-date with prevailing best practices and changes in local laws, regulations and data protection standards and technology.

Given this, we may change our Privacy Policy from time to time and will notify you by posting an updated version of our Privacy Policy on our website. The amended policy will apply between us as and when it is posted on our website. This document represents GHD Foundation's Privacy Policy as at 6 December 2021.

12. How to contact us

If you have any questions about our Privacy Policy, wish to opt-out of our Privacy Policy or have any complaint regarding the treatment of your privacy or personal information by us, please contact GHD Foundation, using the Contact Us link on our website, or contact our Integrity Officer using the details set out below. Any genuine concerns or complaints will be investigated and responded to in line with local law.

Integrity Officer

c/- Office of the Company Secretary
Level 2, 29 Christie Street
St Leonards NSW 2065
Email: integrity@ghdfoundation.org
Website: www.ghdfoundation.org

If you are not satisfied with a response, dependent on your location, you may have an option to refer your complaint to a relevant privacy regulator. We will provide you details of any relevant regulator on request.