Environmental Defenders Office

Privacy Policy

Amendment Log

Change	Section	Date	Responsible
Removed references to ACFID Code of Conduct	Throughout policy	13/05/2026	CC
Health, genetics and biometric information added to *sensitive information* definition	Definitions	13/05/2026	CC / JB
Clarification that EDO does not knowingly collect information from children.	What personal information does EDO collect and hold?	13/05/2026	CC / JB
Information added relating to seeking legal advice via the Gateway on the EDO website	How does EDO collect your personal information?	13/05/2026	CC / JB
Information added to clarify examples where algorithms are used to make decisions	Retargeting	15/07/2026	CC / JB / TT
Additional clarification added including clarification on EDO undertaking Privacy Impact Assessments (PIA)	For what purposes does EDO collect, hold, use and disclose personal information?	13/05/2026	CC / JB
Clarification provided regarding EDO's potential disclosure of personal information to contracted third party service providers that are hosted offshore.	To whom may EDO disclose your information?	25/06/2026	CC / JB / TT
Clarification provided regarding EH's new feature Hero AI	How does EDO collect your personal information?	5/11/2026	CC
Information added about ClickSend.	To whom may EDO disclose your information?	5/11/2026	CC

Introduction

The Environmental Defenders Office Ltd (EDO) recognises the importance of, and is committed to protecting and upholding, the privacy and rights of all individuals EDO deals with, in relation to their personal information.

EDO complies with the Australian Privacy Principles under the *Privacy Act 1988* (Cth)[1] EDO is also required to comply with privacy and confidentiality obligations under legislation regulating provision of advice by the legal profession and various funding agreements.

EDO will follow the guidelines of the *Australian Privacy Principles* in its information management practices.

Purpose

This Privacy Policy explains how EDO collects, uses, discloses and otherwise handles personal information in accordance with the *Privacy Act 1988* (Commonwealth), the Australian Privacy Principles, and the Payment Card Industry Data Security Standard..[2]

It also provides guidance for what to do if you have queries or complaints.

Scope

This privacy policy relates to the full range of EDO's stakeholders - its supporters, staff, volunteers and the communities it works with ("You").

This Policy does not apply to employee records, however still applies to personal information about job applicants, contractors and volunteers or employees of related entities.[3]

Definitions

Personal Information: Personal information in general terms means any information that can be used to personally identify someone. It includes information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

Personal information does not include anonymous information, aggregated or de-identified information.

Sensitive Information: Sensitive information is a subset of personal information and is given a higher level of protection. Sensitive information is defined in the Privacy Act and includes information or an opinion about an individual's racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual preferences or practices; criminal record health, genetics and/or biometrics

Policy Principles

EDO will ensure that:

- it meets its legal and ethical obligations as an employer and service provider in relation to

[1] The Act applies to 'organisations', which is broadly expressed to include individuals, bodies corporate (including incorporated associations and companies limited by guarantee), partnerships and other unincorporated associations.

[3] Under the Cth Privacy Act, employee records held by the Centre about a current or former employee of the Centre will not be subject to the Cth Privacy Act. However, there is no exemption under the Cth Privacy for job applicants, contractors and volunteers or employees of related entities. In addition, State/Territory legislation may still apply to certain employee information.

protecting the privacy of clients and others.

- clients are provided with information about their rights regarding privacy.
- clients, staff and others are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature, and
- all staff, Board members and volunteers understand what is required in meeting these obligations.

What personal information does EDO collect and hold?

The type of information collected will depend on the nature of a person's interaction with EDO, this list is not exhaustive, but provides examples, if you:

- **seek legal assistance**, we may collect your name, contact details, details of your guardian (if applicable), financial details and information about the matter you are seeking assistance with.
- **provide legal assistance to our clients**, we may collect your name, organisation and contact details.
- **register for a subscription to an EDO publication**, we may collect your name, organisation and contact details and details about the information you access in our publications.
- **make a donation to EDO,** we may collect your name, organisation, contact details, the amount and frequency of your donation and payment details.
- **attend a professional development or training program or attend another event**, we may collect your name, organisation, contact details, payment details (if applicable) and any dietary and accessibility requirements.
- **participate in a survey or evaluation**, we may collect your name, organisation contact details and your survey responses.
- **send us an enquiry**, we may collect your name, contact details and details of your query.
- **make a complaint**, we may collect your name, contact details, the details of your complaint, information collected in any investigation of the matter and details of the resolution of the complaint.
- **apply for a role at EDO**, we may collect the information you include in your application, including your cover letter, resume, contact details and references.
- **provide scientific and technical advice to EDO or our clients through our Scientific Advisory Service**, we may collect your name, organisation, contact details and information on your areas of professional expertise.

Our services are not directed to children, and EDO does not knowingly collect personal information from or about children.

How does EDO collect your personal information?

EDO collects personal information directly from an individual unless it is unreasonable or impracticable to do so. This may occur in a range of ways including but not limited to:

- when you correspond with us (for example by letter, fax, email or telephone)
- on hard or soft copy forms
- through a third party online platform (for example when applying for a position with EDO via Employment Hero)

- in person (for example, at job interviews and where we meet with a client to take instructions)
- from referring third parties such as other community organisations
- at events and forums
- Through visiting our website edo.org.au domain.

EDO's web site uses the IP (Internet Protocol) addresses of visitors to the site to administer the site, track users' movements, and to gather broad demographic information. However, IP addresses are not linked to personally identifiable information and therefore the information and statistics EDO produces does not enable individual users to be identified.

EDO does not collect any personally identifiable information from visitors to the site except that which is supplied to us on a voluntary basis.

Where a visitor to EDO's website is seeking legal advice and applies for legal advice via our online gateway, the answers provided by the applicant are assessed against basic criteria to determine if the help they require falls within EDO's remit. Only applications which meet the basic eligibility criteria gather necessary personal information and are forwarded to an employee at EDO for further assessment, those which do not, are automatically rejected by the website.

EDO is also required to collect some personal information relevant to the provision of legal advice under professional obligations and legal profession laws that apply in various States and Territories of Australia.

EDO uses Employment Hero to streamline its HR processes. The Employment Hero platform includes the Hero AI feature which may produce AI-generated scores, ratings or insights based on data in the platform. These features may support EDO's team but human oversight is required for all employment related decisions.

Cookies

We sometimes collect personal information through the use of cookies. *Cookies* are small text files created and stored on your hard drive by your internet browser software, in order to hold relevant information about the web page you are currently viewing. Most internet browsers allow you to disable cookies altogether – please refer to your browser's help menu to find out how to do this. While you will still be able to browse our websites with cookies disabled on your internet browser, some website functionality may not be available or may not function correctly.

Retargeting

We use remarketing to advertise online to reach the public who have visited our website with more content and updates and offers to support us.

We use third parties, google and Facebook and twitter to show adverts based on the publics demonstrated interest from content on our website and adverts.

The public can opt out of this at any time by visiting the Network Advertising initiative opt out page.

We also use a fundraising AI tool called Dataro that provides us with information to engage with specific supporters.

Does anyone other than EDO collect information from EDO website?

Except as stated in this Policy or unless you are informed at the time of collection of information, only EDO collects personal information from the EDO website.

What happens if EDO can't collect personal information?

The nature of EDO's work is that, generally, it is not possible to provide services in an anonymous way. For example, if a client does not provide EDO with the personal information described above EDO may not be able to provide legal services, or provide information about services to that client.

For what purposes does EDO collect, hold, use and disclose personal information?

EDO will process the information that we collect from you and may link or combine your information with other personal information that we hold about you. EDO collects, holds, uses and discloses personal information for the following purposes:

- to assess in line with our legal advice process whether a potential client's request is eligible for assistance.
- to provide legal services, referral or arrangement of non-legal assistance to clients.
- To undertake law reform and policy work.
- for use in monitoring, assessing and improving EDO 's services and operations, including but not limited to seeking client feedback, as part of peer review of service, and reporting to funding providers.
- for planning, quality control and for the creation of anonymous and de-identified case studies.
- to send supporter updates, including case information and updates, fundraising and information about upcoming events.
- for communication and promotion across digital channels and platforms, including social media.
- to answer enquiries and provide information or advice about EDO 's services.
- to send you email and/or postal communications that you have requested.
- to recruit staff, contractors, and volunteers.
- administration of donor and subscription records.
- to notify you about changes to our website and services.
- to make financial transactions in accordance with your instructions.
- technical maintenance.
- to process and respond to any complaints, or issues and
- to comply with any law, rule, regulation, lawful and binding determination.

EDO may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or which are required or authorised by or under law for which the individual has provided their consent.

Where EDO plans to undertake any new high privacy risk project, EDO will undertake a Privacy Impact Assessment (PIA) to ensure there is a risk mitigation strategy in place for any identified risks. The key questions are:

1. Does the project or initiative involve new or changed ways of handling personal information?; and
2. Are there factors that point to the potential for high privacy risk?

What are your choices regarding collection, use, and distribution of your personally identifiable information and how to opt out?

EDO will always ask for your consent to receive emails, event promotions or other correspondence relating to the services of EDO. You can unsubscribe from our email communications at any time. In addition, you can email supporters@edo.org.au to remove your email or mailing address from all our other mailing lists.

What is EDO's policy on allowing website users to update, correct or delete their personally identifiable information?

If you wish to update or amend or remove the information held by EDO (for example to change contact details or to alter preferences with regard to receiving mailings), please contact supporters@edo.org.au. If you identify an error in the information held by EDO, please contact supporters@edo.org.au.

To whom may EDO disclose your information?

EDO may disclose your personal information to:

- employees, volunteers, contractors or service providers for the purposes of providing legal services and to otherwise provide services including but not limited to, IT systems administrators, couriers, data entry service providers, electronic network administrators, mail house/telemarketing operators and professional advisors such as accountants, solicitors, barristers and consultants.
- any organisation for any authorised purpose with the individual's (your) express consent.
- other third parties where permitted or required by law, including where:
    - the client or supporter expressly or impliedly authorises disclosure,
    - EDO is permitted or is compelled by law to disclose,
    - EDO discloses the information in a confidential setting, for the sole purpose of obtaining advice in connection with the solicitor's legal or ethical obligations,
    - EDO discloses the information for the sole purpose of avoiding the probable commission of a serious criminal offence,
    - EDO discloses the information for the purpose of preventing imminent serious physical harm to the client or to another person, or
    - the information is disclosed to the insurer of the EDO.

EDO may disclose personal information to our contracted third-party service providers that are hosted offshore.

EDO utilises Go1 (provided by GO1 Pty Ltd) to deliver, manage, and track training and professional development services for our staff. To facilitate this, we may share limited personal information with Go1, including names, work email addresses, and training completion records.

Go1 processes and stores data in secure Microsoft Azure data infrastructure located in Australia, and the United States.

EDO takes reasonable steps to ensure that Go1 handles the personal information shared securely and in compliance with the Australian Privacy Principles. For more detailed information regarding their data practices, you can review the Go1 Privacy Policy and the Go1 Trust Center.

EDO's National Intake team utilise the SMS functionality of ClickSend to send standardised text messages to inform people that EDO has endeavoured to return their phone call. Clicksend may disclose personal information to overseas recipients, including in the US, UK, New Zealand, Brazil, Vietnam and the Philippines. However, EDO takes reasonable steps to ensure that any SMS send does not contain confidential information.

EDO utilises Stripe and Paypal as payment gateways, both may physically store the encrypted customer data in data centres in the US. Both Stripe and PayPal systems adhere strictly to the highest PCI-DSS Level 1 compliance standards. In addition, our Fundraising, Marketing and Communications Team use many systems where data is stored, including Raisely (fundraising app), Humanitix (ticket sales), GiveNow (legacy donation sites) and Typeform (surveys). These systems will use datacentres across multiple continents. EDO applies data retention settings where possible and only retains data as long as it is useful for marketing or fundraising purposes.

Otherwise, EDO does not disclose personal information to anyone outside Australia without the individual's express consent.

The information that we collect from you may be sent to external service providers that:

- assist EDO with email communications including our newsletter;
- process donations on behalf of EDO
- promote the work of EDO through digital platforms; and
- provide data storage and management services.

Does EDO share user information?

EDO will not sell or rent your personally identifiable information to any third party. In the event that we co-organise or co-host a specific event with a third party, and you register for that event online, the information that you enter when you register, and only that information, may be shared with that third party if we inform you prior to online registration that we will do so. The only other circumstance in which a third party will have access to your personally identifiable information is where that third party is managing and/or maintaining the EDO's computer network, website, databases or sending communications from EDO, on behalf of and as an agent for EDO. In that circumstance at all times the EDO will maintain effective control over the use of your personal information and ensure that it is used only in accordance with this policy.

Please note that the EDO website contains links to other sites. Please be aware that the EDO is not responsible for the privacy practices of such other sites. EDO encourages users to be aware when they leave the site and to read the privacy statements of each and every web site that collects personally identifiable information.

Accessing and correcting personal information

An individual may request access to any personal information EDO holds about them at any time by contacting EDO (see the details below). To protect the integrity and security of the information we hold, we may take steps to verify your identity Where EDO holds information that an individual is entitled to access, we will try to provide the information in the manner requested (for example, photocopies or by viewing a file) and in a timely way. There may be instances where EDO cannot grant access to the personal information held.[4] For example, EDO may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, EDO will provide written notice outlining the reasons for the decision and available complaint mechanisms.

If an individual believes that personal information EDO holds about them is incorrect, incomplete, or inaccurate, then they may request us to amend it. EDO will then consider if the information requires amendment. If we agree that it requires amendment, we will take reasonable steps to correct that information. If EDO does not agree that there are grounds for amendment, then the individual may request that EDO add a note to the personal information stating that the relevant individual disagrees with the information and EDO will take reasonable steps to do so.

If EDO corrects personal information about an individual and has previously disclosed that information to another agency or organisation that is subject to the Privacy Act, the individual may ask EDO to notify that other entity and EDO will take reasonable steps to do so, unless this would be impracticable or unlawful.

Client files

In addition to above, in circumstances where a client requests access to personal information held by EDO, the relevant Managing Lawyer will view the file and approve any copies of material to be given to the client prior to client access. A copy of the relevant part of the file will be made available to the client as soon as practicable after this.

Storage and Security and integrity of personal information

EDO takes reasonable steps to ensure that personal information we collect, use and disclose is accurate, up-to-date, complete and relevant. These steps include promptly updating personal information when we are advised that the information has changed. EDO also takes reasonable steps to ensure personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

We store personal information for as long as it is needed for the purpose for which it was collected or as required by law. We hold personal information in both hard copy and electronic formats. Paper files are stored in secure cabinets onsite. They may also be archived in boxes and stored offsite in secure facilities.

[4] OAIC - APP 12.3 (Exceptions to Access) https://www.oaic.gov.au/agencies-and-organisations/app-guidelines/chapter-12-app-12-access-to-personal-information .

If you are a client, we will return any of your original documents that we have to you when your matter has been finalised. Copies of your documents will remain on your file with us and will generally be kept for seven (7) years after the date that your file has been closed.

The security of your personal information is important to us and we use a range of physical and technical security processes and procedures to protect the confidentiality and security of the information that we hold, and we update these from time to time to address new and emerging security threats.

The steps we take to secure the personal information we hold include:

- website protection measures (such as encryption, firewalls and anti-virus software)
- access restrictions to our computer systems both software and hardware (such as login and password protection and Multi-Factor Authentication (MFA))
- restricted access to our office premises
- staff training and implementation of workplace policies and procedures that cover access, storage and security of information.

  reviewing the privacy practices of third-party cloud or software providers or other relevant contractors to ensure their security matches Australian standards and that they commit to ensure compliance with Australian Privacy Principles and confidentiality of any information shared or used

Website security

While EDO strives to protect the personal information and privacy of users of our website, we cannot guarantee the security of any information that you disclose online to us or from its online products and services and you disclose that information at your own risk. Once EDO receives your transmission, it makes every effort to ensure its security on its systems.

If you are concerned about sending your information over the internet, you can contact EDO by telephone or post (details under 'Contacting Us' section on our website).

You can also help to protect the privacy of your personal information by letting us know as soon as possible if you become aware of any security breach.

Any links on our website to third party websites that are not operated or controlled by us are provided for your convenience. We are not responsible for the privacy or security practices of those websites. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying your personal information to them.

Online Payment Security[5]

Confidential electronic documents are stored and accessible to the staff members who are genuinely in need to know.[6]

EDO is committed to ensuring that any on-line payments to EDO are completed in a secure manner.

[6] EDO Financial Procedures 2015, FILING.

EDO will:

- Protect any stored electronic or hardcopy cardholder data
- Use and regularly update anti-virus software or programs
- Develop and maintain secure systems and applications
- Restrict access to cardholder data by business need-to-know
- Restrict physical access to cardholder data
- Where possible track and monitor all access to network resources and cardholder data
- Regularly test security systems and processes
- Teach employees about security and protecting cardholder data
- Maintain a policy that addresses information security for employees and contractors

Complaints

We try to meet the highest standards in order to protect your privacy, However, if you are concerned about the way in which we have managed your personal information or think we may have breached the Australian Privacy Principles, or any other relevant obligation, please contact us via email - info@edo.org.au Complaints must be lodged in writing. We will deal with the matter within a reasonable time and will keep you informed of the progress of our investigation.

Our process for handling complaints is set out in our complaints management policy (https://www.edo.org.au/wp-content/uploads/2021/04/Complaints-Handling-Policy-Clients-or-Stakeholders.pdf)

If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved satisfactorily, you can contact us to discuss your concerns. You may also make a complaint to the Office of the Australian Information Commissioner (OAIC).

Contact details can be found at the OAIC's website -http://www.oaic.gov.au or, in some instances, other regulatory bodies.

Additional Information and Questions

For questions about this Privacy Policy, as well as any concerns or to make a complaint, please contact EDO's Operations Team via email – info@edo.org.au

Changes to the Policy

EDO may amend this privacy policy, in accordance with changes in our operations or changes in legislation. The current version of the policy will be posted on EDO's website, so that users are always aware of what information is collected, how it is used and the way in which information may be disclosed. A copy may also be obtained by contacting info@edo.org.au

Related Legislation, Guiding Documents and EDO Policies

Legislation

- *Privacy Act 1988 (Cth)*
- *Some States & Territories also have privacy legislation that applies to public sector agencies*

Guiding Documents

- OAIC Guide to Undertaking Privacy Impact Assessments
- CLCA Risk Management Guide

EDO Policies

- Data Management Policy
- Complaints Handling Policy – Clients or Stakeholders
- Information Technology Policy
- Fundraising Policy

Approval, Implementation and Review	
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