

## **Minding Animals International Incorporated**

### **Privacy and Confidentiality Policy**

The Minding Animals International Incorporated (MAI) Privacy Policy describes the personal information that may be collected by us, the choices people can make about their personal information and how we protect that information.

To meet personal expectations about privacy and confidentiality, MAI has operational processes and procedures to comply with US, UK and Australian legislation and regulations.

If you have any questions not addressed in this policy, please feel free to contact us at [mindinganimals@gmail.com](mailto:mindinganimals@gmail.com).

### **Your acknowledgement of our Privacy Policy**

By using the MAI website, an individual or any other entity acknowledges that they have read and understood this privacy policy. Please note that this policy does not extend your rights or MAI's obligations beyond those defined in the legislation in the above jurisdictions.

Should there be any inconsistency between this policy and the legislation of the particular jurisdictions, this policy shall be interpreted to give effect to and comply with such legislation.

This policy includes examples but is not intended to be restricted in its application to such examples. Where the word 'including' is used, it shall mean 'including without limitation'.

Our website contains links to non-MAI websites. MAI is not responsible for the privacy policies of those other websites. We recommend you review the privacy policies of each site you visit.

### **Collection of personal information**

'Personal information' means information we hold about you from which your identity is either clear or can be reasonably determined. When you give us your personal information, it imposes a serious responsibility on us. Protecting your privacy when handling your personal information is very important to us and is fundamental to the way we serve you.

Generally, we will collect personal information directly from you, and only to the extent necessary to provide the product or service (including our organisational functions) you requested or to carry out our internal administrative operations. An 'organisational function' means a service that we provide to you on behalf of another organisation in the course of our service provision.

We may collect personal information from you when:

- you fill in an application form;
- deal with us over the telephone;
- purchase a product or service;
- email MAI;

- become a member / supporter; and
- ask us to contact you after visiting our web site.

We will collect personal information from you by lawful and fair means and not in an unreasonably intrusive way.

If you choose to not provide your personal information when requested, we may not be able to deliver the product or service that you have requested. We will endeavour to make this as clear as possible for each product or service.

### **Information collected**

As noted above, we will only collect personal information from you that is necessary to provide the product or service or to carry out internal administrative functions. We collect different personal information depending on the product or service that you have requested. Some examples include:

- **Newsletters** – MAI distributes the MA Bulletin. We collect your name and your email address which we keep until you choose to unsubscribe from this service.
- **Money Transfers** - When you visit the MAI website to transfer money, we capture personal details from you to enable the transfer of funds from you. This information is held for a period of three months as part of the administration of this service. All personal information related to the transfer is then removed from our systems.

For some services, where additional clarification is required, we can provide a product privacy notice or product privacy statement. Please refer to these statements for additional privacy details for specific products.

### **Unsolicited information**

‘Unsolicited’ personal information is personal information about an individual that an organisation has unintentionally received. It is anticipated that this is an uncommon occurrence for MAI, but when it does happen, we will protect your personal information with the same rigour as we treat personal information that we intended to collect. If we could not have collected this information through our normal processes, we will de-identify that information as soon as we can.

### **Uses and sharing**

We use the personal information you provide only for purposes consistent with the reason you provided it, or for a directly related purpose. We may also use your personal information where required or permitted by law. We may also use your information where you have provided us with your express or implied consent.

We do not share your personal information with other organisations unless:

- you give us your express consent; or
- sharing is otherwise required or permitted by law.

When we temporarily provide personal information to companies who perform services for us, such as specialist information technology companies or mail house contractors, we will require those companies to protect your personal information as diligently as we do. Strict contractual and other quality assurance measures are used to ensure your personal information is protected.

We have a strict duty to maintain the privacy of all personal information we hold about you. However, certain exceptions do apply. For example, where disclosure of your personal information is:

- authorised or required by law (for example, disclosure to various government departments and agencies such as for taxation purposes or disclosure to courts under subpoena);
- in the public interest (for example, where a crime, fraud or misdemeanour is committed or suspected and disclosure against the customer's rights to confidentiality is justified); and
- with your consent - your consent may be implied or express and it may also be verbal or written.

### **Treatment of personal information with National Groups**

MAI can disclose personal information (excluding sensitive information) with National Groups as long as the purpose for sharing is related to the reason the personal information was originally collected.

### **Overseas use and disclosure**

MAI may transfer personal information to countries outside those nominated in this privacy policy. We will only do so in compliance with all applicable data protection and privacy laws. MAI will take reasonable steps to protect personal information no matter what country it is stored in or transferred to.

### **Direct marketing**

From time to time we may use the personal information we collect from you to identify particular MAI products and services which we believe may be of interest to you. We may then contact you to let you know about these products and services and how they may benefit you. We will generally only do this with your prior consent (where practical) and we will always give you a choice to opt out of receiving such information in future.

Direct Marketing from MAI generally will take the form of Direct Mail or Electronic Marketing (email). In rare cases, in the future we may use telemarketers. Each of these channels is handled as follows:

- **Direct mail** - Where we use your personal information to send you marketing information via the post, we may do so with your implied consent or, if this is impracticable, we will ensure that you are provided with an opportunity to opt out of receiving future such communications. By not ticking a clearly displayed 'opt out' box, we will assume we have your implied consent to receive similar marketing communications in the future. We will always ensure that our opt out notices are clear, conspicuous and easy to take up;

- **Electronic marketing** - Where we use your personal information to send you marketing information by email, SMS, MMS or other electronic means we may do so with your express or implied consent. You may give us your express consent by, for example, ticking a box on an electronic or paper form where we seek your permission to send you electronic or other marketing information. Consent may be implied from our existing business relationship or where you have a reasonable expectation of receiving an electronic marketing communication.
- **Telemarketing** - MAI will not usually engage in telemarketing. Generally, such marketing is will only be used in relation to the conduct of our business. Should any consumer telemarketing be undertaken or authorised by MAI, we will, to the extent that it applies, comply with the relevant legislation.

Every directly addressed marketing contact sent or made by MAI will include a means by which customers may unsubscribe (or opt out) of receiving further marketing information.

Additionally, you may instruct us at any time to remove any previous consent you provided to receive marketing communications from us. Requests should be directed to the MAI Secretary or Membership Officer.

### **Accessing your personal information**

You have the right to request access to the personal information we hold about you. This right is subject to certain exceptions (see below) allowed by law.

MAI will, upon your request, and subject to applicable privacy laws, provide you with access to your personal information that is held by us. However, we ask that you identify, as clearly as possible, the type (or types) of information requested. MAI will deal with your request in a reasonable time - usually within 30 days.

Depending on the breadth of your request, we may recover from you our reasonable costs incurred in supplying you with access to this information.

### **Exceptions**

Your right to access your personal information is not absolute. In some circumstances, certain legislation permits us to refuse your request to provide you with access to your personal information, such as circumstances where:

- access would pose a serious threat to the life or health of any individual;
- access would have an unreasonable impact on the privacy of others;
- the request is frivolous;
- the information relates to a commercially-sensitive decision-making process;
- access would be unlawful; and
- access may prejudice enforcement activities, a security function or commercial negotiations.

## **Freedom of information laws**

In addition to privacy laws, you may have rights to access your personal information contained in certain MAI documents. Details on how to apply for access to these documents are contained in the various jurisdictions.

## **Updating your information**

It is inevitable that some personal information which we hold will become out of date. We will take reasonable steps to ensure that the personal information which we hold remains accurate and, if you advise us of a change of details, we will amend our records accordingly.

Where your information has been disclosed to a third party, MAI will take reasonable steps to notify the third party of the correction.

Where we are unable to update your information, we will provide an explanation in writing as to why the information cannot be corrected.

## **Information security**

MAI is committed to keeping your trust by protecting and securing your personal information.

We will employ appropriate technical, administrative and physical procedures to protect personal information from unauthorised disclosure, loss, misuse or alteration.

We limit access to personal information to individuals with a business need consistent with the reason the information was provided. We keep personal information only for as long as it is required for business purposes or by the law.

MAI protects your personal information by complying with information security standards, industry schemes and statutory obligations. We regularly conduct targeted internal and external audits on our security systems to validate the currency of our security practices.

## **Website security and privacy**

We understand that you may be concerned about the security of the personal information we collect from you online.

Accordingly, we have systems in place to ensure our online dealings with you are as secure as your dealings with us in person, or on the telephone.

In those instances where we secure your personal information in transit to us and upon receipt, we will use the industry standard encryption software, Secured Socket Layer (SSL) 128 bit encryption. The URL in your browser will change to "HTTPS" instead of "HTTP" when this security feature is invoked. Your browser may also display a lock symbol on its bottom task bar line to indicate this secure transmission is in place.

For site security purposes and to ensure this service remains available to all users, we employ software programs to monitor network traffic in order to identify unauthorised attempts to upload or change information, or otherwise cause us damage. Except for authorised law enforcement

investigations, no other attempts are made to identify individual users or their usage habits other than those uses identified in this policy. Unauthorised modification or misuse of information stored in this system will be investigated and may result in criminal prosecution.

### **Information collected on this website**

We may collect non-personal information from you such as browser type, operating system, and web pages visited to help us manage our web site.

We may use cookies and other internet technologies to manage our website and certain online products and services. We do not use these technologies to collect or store personal information unless you have opted in to such a feature.

Our internet server may log the following information which is provided by your browser for statistical purposes only:

- the type of browser and operating system you are using;
- your Internet Service Provider and top level domain name (for example - .com, .gov, .au, .uk .ac, .edu);
- the address of any referring web site (for example - the previous web site you visited);
- your computer's IP (Internet Protocol) address (a number which is unique to the machine through which you are connected to the internet).

All of this information is used by MAI for aggregated statistical analyses or systems administration purposes only. No attempt will be made to identify users or their browsing activities, except where required by law.

### **Cookies**

A 'cookie' is a packet of information stored on your computer that allows the MAI server to identify and interact more effectively with your computer.

Our website will use two different kinds of cookies:

- Session cookies - temporary cookies that only last until you close your browser; and
- Persistent cookies - cookies that are stored for a longer term on your computer.

### **Session cookies**

When you access our website, we may send you a temporary cookie that gives you a unique identification number. A different identification number is sent each time you use our website. Cookies do not identify individual users, although they do identify a user's internet browser type. When you close your browser the cookie is deleted and no longer exists on your computer.

You are free to disable cookies in your browser (see details below). If you have disabled cookies you may not be able to take full advantage of all of our website features.

We use session cookies in the following manner:

- **Log-on and log-off administration** - Session cookies help with the log-on and log-off processes for those users who have decided to register to use one of our online services. The cookies enable us to recognize your user ID when you log on so that we do not establish a duplicate registration record for you; and
- **Transactions and site usability** - We use session cookies to improve how you navigate through our website and conduct transactions. As examples, session cookies are used to maintain your online session as you browse over several pages; to store and pre-populate information so that you do not have to re-enter the same information twice. Session cookies may also be used to collect referral statistics when you click on a link or ad banner to or from [mindinganimals.com](http://mindinganimals.com).

### **Persistent cookies**

MAI may also use 'persistent cookies'. A persistent cookie is a small piece of text stored on your computer's hard drive for a defined period of time, after which the cookie is erased. MAI will not collect or link to personal information through persistent cookies without your express consent.

We use persistent cookies as follows:

- **Site usage measurement** - Our site measurement tool uses a persistent cookie to assist us in measuring how and when our web site and its various components are used. It functions as a 'visit cookie', so we can determine if you are a repeat visitor to our site. This allows us to know if we are attracting new visitors and what aspects of the site seem most useful. The cookie will expire 30 days after your last visit.
- **Log-off safety function** - MAI uses a persistent cookie to automatically log you off of certain MAI sites if there has been no activity for 15 minutes. This is done for your safety to ensure that, if you have finished using our site but have forgotten to log off, no one else can use your computer via your log on and password. The cookie is permanently removed from your computer when you log off, or, if you have closed the browser without logging off, it is removed within 15 minutes from your last activity.
- **Longer-term cookies** - Persistent cookies allow us, at your request, to recognise you when you return to [mindinganimals.com](http://mindinganimals.com) or to remember certain information that you have provided us. The recognition feature allows you to log on to certain MAI sites automatically, without having to enter your name and password each visit. The cookie assigns a random number to you, and allows us to track your site activity, but this is not linked to personal information. This allows us to personalise the site for you and tailor the content to your needs, for instance to show you banner ads about other products you may be interested in.

Other cookies allow us to remember certain information related to prior transactions, such as package tracking numbers, or mailing or address lists, so we may pre-populate those fields for you on return visits.

## **Cookie Management**

You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. Most browsers accept cookies by default. To learn more about cookies, including how to refuse cookies on your computer, click these links:

- [Microsoft Internet Explorer \(External link\)](#)
- [Mozilla FireFox \(External link\)](#)
- [Google Chrome \(External link\)](#)
- [Apple Safari \(External link\)](#)

## **Links to other sites**

The MAI site contains links to other sites. We are ultimately not responsible for the privacy practices or the content of such web sites. We encourage you to read and understand the privacy policies on those websites prior to providing any information to them.

Some of the content appearing on the MAI website may be supplied by third parties, for example, by framing third party web sites or the incorporation through 'framesets' of content supplied by third party application service providers. In such cases, MAI will ensure that our contractual arrangements with these third parties protect your personal information in compliance with privacy laws.

## **Searches**

Search terms that you enter when using our search engine are collected, but are not associated with any other information that we collect. We use these search terms for the purpose of aggregated statistical analyses so we can ascertain what people are looking for on our website, and to improve the services that we provide.

We may use external companies to provide us with detailed aggregate statistical analyses of our website traffic. At no time is any personal information made available to these companies, nor is the aggregate information ever merged with personal information such as your name, address, email address or other information you would consider sensitive or would compromise your privacy.

## **Loss of personal information**

Despite our every effort to protect your personal information, there remains the possibility that a breach of our security could occur. In the event of loss of personal information MAI will:

- seek to rapidly identify and secure the breach to prevent any further breaches;
- engage the appropriate authorities where criminal activity is suspected;
- assess the nature and severity of the breach including the type of personal information involved and the risk of harm to affected individuals;
- notify the affected individuals directly if appropriate and where possible;

- if appropriate, put a notice on our website advising our customers of the breach; and
- notify the relevant national authorities if the breach is significant.

### **Children's privacy**

MAI believes it is important to provide added protection for children online. We encourage parents and guardians to spend time online with their children to participate in and monitor their online activity.

When we provide a product or service that intentionally collects personal information from children, we will give a notice specifying what information we are requesting, how we will use it, whether it will be shared with a third party, and a contact at MAI for questions. We will utilise the information only for the particular purpose for which it was given to us.

We will use reasonable efforts to verify parental consent prior to the collection and use of personal information from children under 16. The method of verification may vary according to the information, product, service or event in which the child wishes to participate. Consent may take a variety of forms including offline consent such as printing and submitting a permission form by mail or fax, or online consent such as by ticking an online check box that parental or guardian consent has been obtained.

We do not require parental or guardian consent in order to collect and use online or offline contact information to:

- respond directly to a child's request on a one-time basis, or to answer a specific request, where the information is not intended to be used to re-contact the child for other purposes;
- request the name or on-line contact information of a parent/guardian for the sole purpose of obtaining verifiable parental consent or providing parental notification; and
- respond directly more than once to a specific request from a child and the information is not intended to be used to re-contact the child beyond the scope of the request.

MAI will allow parents or guardians to review any personal information collected from their children, subject to verifying the identity of the consenting parent/guardian.

Parents/guardians may revoke their consent and delete information collected from their children at their discretion.

### **How to contact us**

MAI is committed to working with its members and or customers to obtain a fair resolution of any complaint or concern about privacy.

To contact us with a compliment or complaint or a privacy question, please send an email to: [mindinganimals@gmail.com](mailto:mindinganimals@gmail.com)