

THE  
P/NNACLE  
FOUNDATION

ABN 81 127 662 604

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## Privacy Policy for The Pinnacle Foundation

Protecting your privacy is important to us. This policy explains how we manage personal information within our organisation.

The Pinnacle Foundation is an 'APP entity' within the meaning of the Privacy Act 1988 (Cth). We comply with the Australian Privacy Principles (APPs), the Notifiable Data Breaches scheme and other relevant privacy obligations.

## Kinds of Personal and Sensitive Information We Collect

The kinds of personal information that we collect and hold about you may include:

- identifying information, such as your name and date of birth;
- contact information, such as your postal address, email address and telephone number;
- social media handles and other social media profile information that you make available to us or to the public;
- financial information, such as credit card, bank account or other payment details;
- records of our communications with you, including any messages you send us; and
- device information, server log information, IP address, and location information.

We also collect and handle sensitive information with enhanced safeguards. This includes information you provide when you start an application to be a scholar, fellow, financial support recipient or mentor about your gender and sexual identity, cultural background, education and lived experience.

We implement safeguards to prevent unauthorised disclosure or misuse. We take particular care to protect sensitive information, including information that could be used for doxxing. Without this information we may not be able to provide you with access to all our offerings and services such as our newsletters, website account login, scholarship, fellowship, financial support, mentor and volunteer programs, to respond to queries or requests that you submit to us, or to provide you with a tax invoice in relation to your donation.

## How We Collect Personal and Sensitive Information

We collect personal information about you:

- when you apply as a scholar, fellow, financial support recipient, mentor, or volunteer;
- when you apply for a job with us;

- when you donate;
- when you attend an event that we're hosting;
- when you contact us; and
- by tracking your use of our websites and mobile applications.

Where we collect personal and sensitive information from you, we will generally do so directly ourselves. However, in some cases we may collect personal or sensitive information from a third party, such as to confirm references that you have provided to us. In these cases, we will generally do so with your express permission.

### Purposes for Which We Use Personal and Sensitive Information

We collect personal and sensitive information only where reasonably necessary for, or directly related to, our charitable functions, or where you have consented. Where scholars receive a named scholarship, we may disclose limited personal and sensitive information (including name, study field, university, lived experiences and gratitude messages) to the funder of that scholarship. Scholars are informed of and provide specific consent for this disclosure during the application or onboarding process.

We collect, store and disclose personal and sensitive information that we collect about you for the following purposes:

- to verify your identity when you are dealing with us;
- to answer your queries and requests;
- to conduct the application process for scholars, mentors, volunteers and employees;
- to run our scholarship, mentor and volunteer programs;
- to analyse and report on trends and conduct research;
- to receive and manage donations;
- to comply with our legal and regulatory obligations;
- to manage and resolve any legal or commercial complaints or issues;
- to promote our organisation, including by hosting events and publishing stories on our website and social media;
- to assess, maintain, upgrade and improve our operations, programs and offerings;

- to carry out education and training programs for our staff and volunteers; and
- to keep you informed about our activities, including by sending donor and partner updates and newsletters.

We may from time to time use your personal information to send you communications about our organisation. You can opt-out of receiving marketing communications from us by contacting us at [privacy@thepinnaclefoundation.org](mailto:privacy@thepinnaclefoundation.org) or following the "unsubscribe" link in the communication.

The Pinnacle Foundation generally does not use artificial intelligence (AI) or automated decision-making systems to assess scholarship applications. All scholarship assessments are generally conducted by trained individuals.

Where automated decision-making systems are used, we will take reasonable steps to inform you and provide information about how such decisions are made. We will endeavour to conduct Privacy Impact Assessments (PIAs) before introducing such systems.

We generally only use or disclose your information for clearly identified purposes or where required or authorised by law. We may also use and disclose your information for other purposes as authorised by you, or in accordance with your requests or instructions.

### How do we store and protect your personal information?

As referred to earlier, we use a range of technical and organisational measures and safeguards to maximise the security of the physical and electronic information we store. These technical and organisational measures and safeguards are intended to avoid the misuse, loss or unauthorised access, modification or disclosure of your personal information. The measures and safeguards we use, in different circumstances, include:

- role-based systems access, regularly reviewed;
- use of multi-factor authentication where available;
- requirement for volunteers to sign a volunteer agreement which includes privacy obligations and provision of induction materials;
- annual privacy awareness training for relevant staff and volunteers;
- notifiable data breach response training for relevant leaders;
- request for inclusion of privacy breach notification clauses, security standards, and right to audit in future third party agreements;
- collecting only information necessary for program delivery, reporting and compliance;

- establishment of data retention and destruction guidelines and periodic deletion/ destruction of data;
- maintenance of a personal information category and breach impact register, and data breach register;
- conducting privacy impact assessments for high privacy risk projects;
- reporting of data breaches to our insurers within policy timeframes and cooperating with our forensic/legal partners;
- encryption of data at rest and in transit, using several strong encryption protocols, and technologies that include Transport Layer Security/Secure Sockets Layer (TLS/SSL), Internet Protocol Security (IPSec), and Advanced Encryption Standard (AES);
- specific services delivered through our managed IT services provider, including:
  - identity:
    - minimum delegate access to sensitive company resources;
    - zero trust policy consulting;
    - single sign-on – providing a single vector for audit trails and offboarding;
  - device:
    - application control, OS and app patching;
    - hardware enrolment requirements;
    - local anti-virus, file quarantine and scheduled definition updates;
    - zero-trust local user privileges (restrict administrative privileges);
    - storage encryption enforcement;
  - cloud:
    - multi-factor authentication enforcement and conditional access;
    - strong email quarantine filters (release requests only);
    - geofenced access restrictions (AU IP address regardless of authentication level);

- cloud-delivered EDR and SIEM reporting;
- continuity:
  - daily offsite snapshot backups – data and emails;
  - disaster recovery plans – real-time wipe and reset controls; and
  - “break glass” account management, with 24/7 emergency service provisions.

We hold personal information electronically and in hard copy form, both at our own premises and with the assistance of our service providers.

While we take reasonable steps to protect the personal information we hold, we are unable to guarantee the security of that information. We recommend that individuals familiarise themselves with steps they can take to protect the security of their own personal information.

### People to Whom We Disclose Personal and Sensitive Information

Some of our service providers, including data storage and technology service providers are located or use locations outside of Australia. Our service providers or their data storage servers may be located and may store your personal information in several countries.

Some personal and sensitive information may be stored or accessed outside Australia — including in New Zealand (for our customer relationship system, Vega) and other jurisdictions used by Microsoft 365, Xero and Submittable. We take reasonable steps to ensure any overseas recipients comply with privacy standards equivalent to the APPs (including APP 8).

We also take steps to ensure all mentors, volunteers, and scholarship selection panel members sign an agreement which requires adherence to our privacy policy and strict confidentiality before receiving access to personal or sensitive information. Data disclosed is limited to what is strictly required to fulfil their role.

We may share personal and sensitive information about you with:

- your representatives and others you have authorised to interact with us on your behalf;
- our staff, mentors and volunteers who need the information to discharge their duties;
- the funder of a scholarship or fellowship or other program providing financial support that you receive;
- our agents and service providers, including IT service providers, marketing and design agencies;

- payment system operators and financial institutions;
- professional advisers who we engage to provide advice on our business; and
- government authorities who ask us to disclose that information, or to other people as required by law.

We take steps to ensure disclosures are lawful and proportionate, and to avoid your personal or sensitive information being disclosed in ways that could constitute a serious invasion of privacy.

### Cookies

We use cookies to monitor and observe your use of our websites, compile aggregate data about that use, and provide you with a more effective service (which may include customising parts of our websites based on your preferences and past activities on those websites). "Cookies" are small text files created and stored on your hard drive by your internet browser software to hold relevant information about the web page you are currently viewing. Most internet browsers have a facility that will 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.

### Access and Correction

If you want to access any of the personal information that we hold about you or to correct some aspect of it (for example, because you think it is incomplete or incorrect), please contact us using the contact details set out below. To protect the integrity and security of the information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity. In certain cases, we may charge you a reasonable administration fee for providing you with access to the information you have asked for, but we will inform you of this before proceeding.

There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases, we will let you know why we cannot comply with your request.

You have the right to seek redress through the Office of the Australian Information Commissioner (OAIC) if you believe your privacy rights have been breached.

### Complaints

We try to meet the highest standards to protect your privacy. However, if you are concerned about how we are managing your personal information, please contact us using the contact details set out below. 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.

Individuals may also have the right to seek legal redress for serious invasions of privacy.

### Data Breach Notification

We maintain a formal Data Breach Response Plan to assess and respond to actual or suspected breaches. Where an eligible breach occurs, we will notify the the Office of the Australian Information Commissioner and affected individuals as required under the Notifiable Data Breaches scheme within the required timeframe.

### Changes to this Policy

We may make changes to this policy from time to time, to consider changes to our standard practices and procedures or where necessary to comply with amendments to existing laws and regulations and new laws and regulations. We endeavour to notify individuals of material changes to this policy through our website or other direct communication channels.

The latest version of this policy is available on our website.

Last updated: December 2025.

### Contact Details

If you need to contact us or want any further information from us on privacy matters, please contact us at:

By email: [privacy@thepinnaclefoundation.org](mailto:privacy@thepinnaclefoundation.org)

By post: Privacy Officer  
The Pinnacle Foundation  
PO Box 990 Potts Point NSW 1335 Australia

# THE P/NNACLE FOUNDATION

[THEPINNACLEFOUNDATION.ORG](http://THEPINNACLEFOUNDATION.ORG)

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THE PINNACLE FOUNDATION IS ENDORSED AS A DEDUCTIBLE GIFT RECIPIENT BY THE AUSTRALIAN TAXATION OFFICE. DONATIONS OF \$2 OR MORE ARE TAX DEDUCTIBLE.

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