



Monitoring Conditions in Detention
& Other Closed Environments

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bonigi privacy policy

bonigi Pty Ltd ('we', 'us', 'our', and 'bonigi') recognise how important it is to protect the privacy of individuals and their right to have their personal information protected. bonigi takes very seriously our responsibility to ensure that everyone who entrusts us with their personal information is able to do so confident in the knowledge that their information will be collected, used and stored lawfully and transparently.

Overview of our commitment to your privacy:

- We collect personal information directly from you and only with your consent.
- We only store and use your personal information in ways that you authorise.
- If you join our mailing list you can opt out of receiving communications at any time.
- When you use our data collection tools, you always have the option to participate anonymously.
- Even if you give us personal information, we will take all reasonable steps to de-identify you.
- Third-party services/platforms we use comply with the EU General Data Protection Regulation.
- We will not share your information with any other agent or organisation.
- We take all reasonable steps to protect your personal data from misuse, interference and loss.
- We take all reasonable steps to protect it from unauthorised access, modification or disclosure.
- Data we collect through online surveys is stored and processed in the European Economic Area.
- We will not store your data for longer than is necessary and as required by law.
- If the personal data you share is sensitive, we taken an even higher level of care to protect it.
- For any personal data that you share with us, you have the right to:
 - **know** how and why we are collecting, using, and storing your data.
 - **access** the information we hold about you, and to know how we process it.
 - **amend** your personal data if it is incorrect, inaccurate or incomplete.
 - **erasure** (be forgotten) by having all your personal data deleted or removed without a reason.
 - **block or suppress** the processing of your personal data.
 - **retain and reuse** your personal data for your own purposes.
 - **object** to your personal data being used.

Please write to info@bonigi-monitoring.com if you have any queries, concerns or complaints.

What is 'personal information'?

When we talk about 'personal information' we mean any information that identifies you or could be used to identify you personally. This may include your name, email address, telephone number, organisation or affiliation, and profession or occupation. If the information we collect personally identifies you or you are reasonably identifiable from it, the information will be considered personal information and we will protect it accordingly.

e: info@bonigi-monitoring.com

w: bonigi-monitoring.com

a: bonigi Pty Ltd P.O., Box 437, Yarraville, Vic, 3013, Australia

Who do we collect personal information from?

We collect information about people with whom bonîgi has contact in connection with its activities, including immigration detainees, visitors, and official monitors.

We collect information directly from you and only with your consent. We do not collect any personal information by default.

How do we treat your personal information?

We treat your personal information and your right to privacy with the respect they deserve. We will therefore only store your personal information and use it in ways that you authorise us to.

What personal information do we collect and hold?

The type of information we collect and hold will vary according to the purpose for which we are collecting it.

When we collect information through our data collection tools, you will always have the option to participate anonymously. Even if you do provide us with personal information, we take all reasonable steps to de-identify your personal data in a way that ensures that your personal information, including any information share about yourself that is of a sensitive nature, is not disclosed without your permission in any way that would identify you. This means we take all reasonable steps to protect your personal data from misuse, interference and loss, as well as to protect it from unauthorised access, modification or disclosure.

What is sensitive information?

Sensitive information is defined in the *Privacy Act* to mean 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, or
- Criminal record

In other words, sensitive information is information about who you are or what you believe. We take a broad view of the meaning of 'sensitive information' because we also recognise that other attributes that may be considered sensitive information include such things as legal status. We will only ever collect sensitive information about you with your express consent.

How do we collect your personal information?

We collect personal information you provide to us directly, whether you do so in person, or by telephone or email, or via our website or one of our digital data collection tools. If your personal information has already been put in the public domain by you, we may use that information but will cease doing so if you ask us not to.

We use third party services and platforms such as [Mailchimp](#), [CheckMarket](#) and [WordPress](#), which have their own privacy policies. We ensure that any third-party services and platforms that we use comply with our legal obligations, including the EU General Data Protection Regulation (GDPR).

How do you ensure that my information is kept safe?

We take all reasonable steps to ensure your personal information is protected from unauthorized access, misuse, loss, modification, or disclosure. boniği's uses data processing and storage services in the European Economic Area. All data collection, processing and storage takes place in accordance with the Australian law and EU law.

Your personal information will be destroyed or de-identified when it is no longer needed.

Does boniği share my information with anyone?

No. Although we may *collect* data through third-party services and platforms, as noted above we ensure that their practices are consistent with our legal obligations, including the EU General Data Protection Regulation. We will not share your information with any other agent or organisation. We will not sell or lease your personal information to third parties.

What are my rights with regard to the personal information I have provided to boniği?

In Australia, boniği is required to handle your information based on based on our obligations under the [Information Privacy Act 2000 \(Vic\)](#) and the [Privacy Act 1988 \(Cth\)](#). Given that we also collect data from individuals within the European Economic Area, we are also obliged to comply with the [EU General Data Protection Regulation](#) (GDPR). Importantly, this means that you have the following rights with regard to your personal information:

- **The right to be informed**
You have the right to know—in a way that is understandable and clear—how and why the GDPR is collecting, using, and storing your data.
- **The right to access**
You have the right to know exactly what information we hold about you, and how we process it.
- **The right to rectification**
You have the right to amend your personal data if it is incorrect, inaccurate or incomplete.
- **The right to erasure**
Also known as the “Right to be Forgotten,” you have the right to have all of your personal data deleted or removed, without the need for a specific reason.
- **The right to restrict processing**
You have the right to block or suppress the processing of your personal data.
- **The right to data portability**
This allows you to retain and reuse your personal data for your own purpose.
- **The right to object**
In certain circumstances, you have the right to object to your personal data being used.

Please write to info@bonigi-monitoring.com if you have any queries, concerns or complaints.

Joining our mailing list and opting out

You can join our mailing list through our website or by agreeing to join it through one of our data collection tools.

You can opt out of receiving communications from us at any time by:

- Unsubscribing to one of our electronic communications; or
- Emailing us to say you no longer wish to receive emails or other communications.

What do you find out about me when I visit your website?

When you visit our website, we may collect anonymous data for statistical purposes. This information is not linked to your personal information. Our purpose in collecting such data is to improve our understanding the needs and interests of our users and to enable us to improve our website's functionality and navigability in order to enhance user experience.

Links to other sites

Please be aware that while visiting our website, visitors may be able to follow links to other sites that are beyond our sphere of influence. Please know that boniġi is not responsible for the content or privacy policy of these other sites. However, please tell us if you have any concerns about our links to these sites.

How can you complain about the way we have collected, used, or stored your personal data?

boniġi is committed to protecting your right to privacy and complying with our legal obligations to do so. If you believe that we have or may have breached our obligations, including the Australian Privacy Principles, or other privacy legislation including the GDPR, please contact us on info@bonigi-monitoring.com or write to us at P.O. Box 437, Yarraville, Vic 3013, Australia.

How will I know if boniġi's privacy policy changes?

While we reserve the right to review and update our privacy policy, we remain committed to taking all necessary and reasonable steps to protect the personal data you entrust to us. Remember, we treat your personal information and your right to privacy with the respect they deserve. We will therefore only store your personal information and use it in ways that you authorise us to.

Legislation and standards governing our obligations to protect your personal data:

[Australian Privacy Principles](#)

[EU General Data Protection Regulation](#) (GDPR)

[Information Privacy Act 2000 \(Vic\)](#)

[Privacy Act 1988 \(Cth\)](#)

Last updated 9 July 2020.