

The Fundraiser's Data Dilemma

Balancing the risks of privacy breaches and revenue loss.



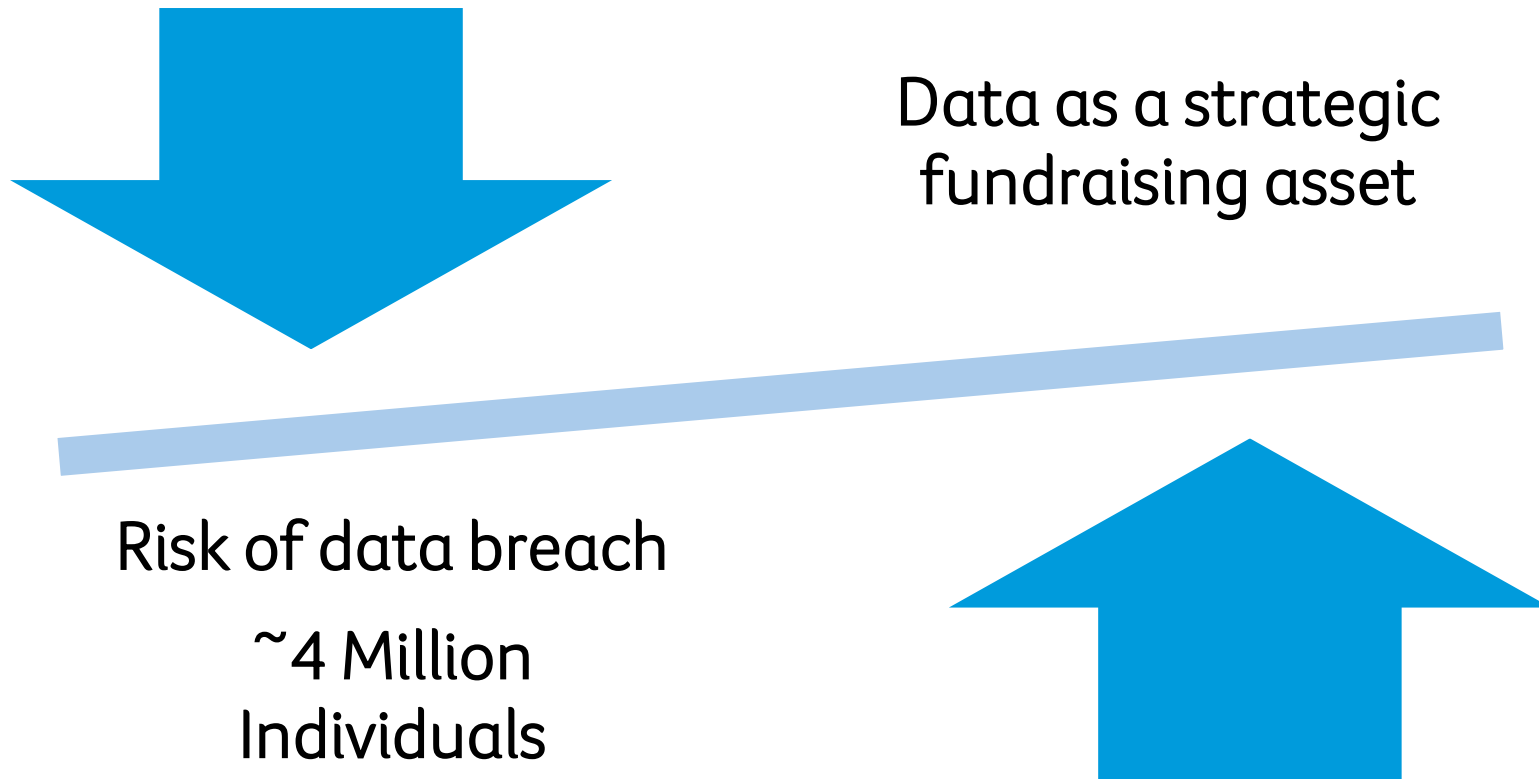
Cancer Council NSW's purpose

We change the path of cancer and make sure no one walks alone.



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The Fundraiser's Data Dilemma



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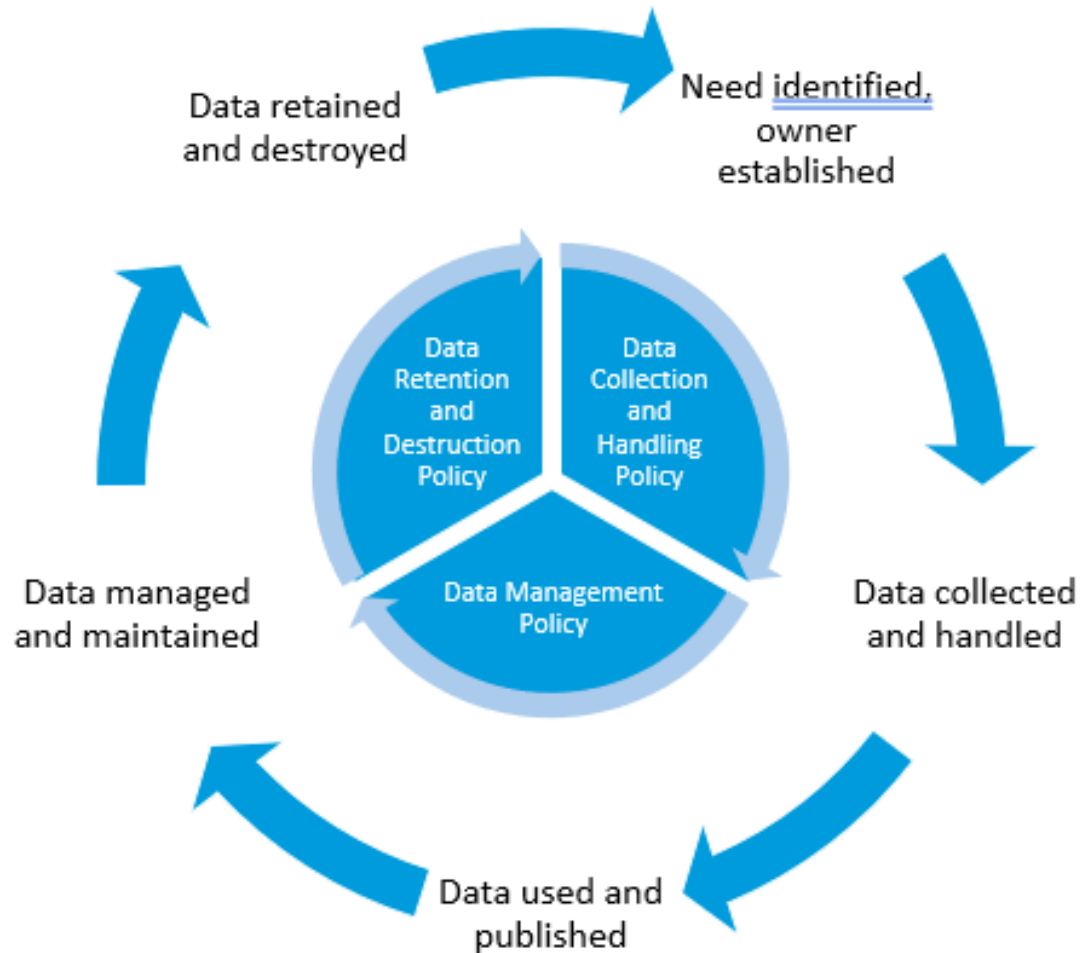
Cancer Council NSW raised \$79 Million in FY25 from 245k Supporters

- **\$29 Million from GIWs (\$17m from known individuals)**
- **\$3.4 Million from reactivations**
- **4 Million Constituent Records on CRM (at 2024 peak)**
- **6k Supporters have confirmed a gift in their will**
- **33k Planning or Considering a gift in their will**



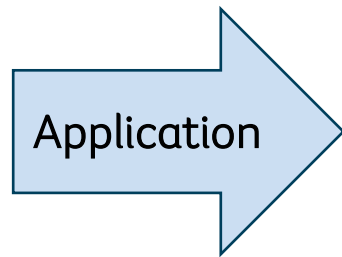
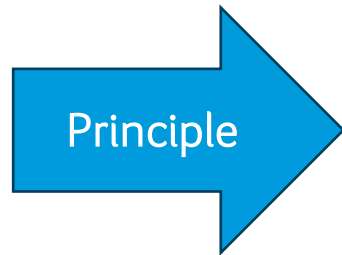
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Data Management a Priority on our Strategic Plan



- **Data Lifecycle Management Project** - Started May 2023, to uplift Data collection, management and retention policies and practices
- Data Retention & Destruction Policy and Schedule prioritised
- Shift in focus from retention to destruction

Record Retention & Destruction Principles



Data has a lifespan

- Data has a useful life and must be destroyed at the end of the lifecycle
- Schedule is expression of useful life of data, permanent retention limited to records other than personal information

Data as a strategic asset

- Schedule now represents our risk appetite, balances risk of harm to constituent/ CCNSW vs service delivery, revenue generation, compliance best practice
- General approach is conservative on retention periods, we need to start destruction somewhere but can always reduce retention periods later, cannot re-instate destroyed data

Data and process ownership

- Schedule set out by data owner (division/ team) to aid interpretation and clarify owner
- Schedule set out by data process (e.g. where the same data is used by different teams each process is captured separately) to define appropriate retention period for each business process



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“It’s not if, but when”

Pareto Phone, telemarketer at centre of charity cyber hack which targeted tens of thousands of Australian donors, collapses

By Jemima Burt Charities

Sat 21 Oct 2023



The ABC understands employees of Brisbane-based Pareto Phone were told on Friday afternoon they no longer had jobs. (ABC News: Lewi Hirvela)

Tens of thousands of donors to dozens of charities — including the Fred Hollows Foundation, Cancer Council and Canteen — had personal details like date of birth and contact details published on the dark web

numb
have



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Qantas hit by cyber attack, leaving 6 million customer records at risk of data breach

By business editor [Michael Janda](#) and The Business presenter [Kirsten Aiken](#)

Cyber Security

Wed 2 Jul



8

Qantas says a cyber criminal targeted a call centre and gained access to a third-party platform. (AAP: Dan Himbrechts)

Cancer Council hit by cyber attack, leaving 4 million donor and patient records at risk of breach

By business editor Michael Janda and The Business presenter Kirsten Aiken

Cyber Security

Wed 2 Jul

Fictitious Headline and image
- AI Generated



Setting the Retention Limits

Reactivation Income Analysis

- Less than \$35K income p.a. from supporters lapsed 10 years+
- Less than \$5K income p.a. from supporters lapsed 15 years+

Contested Estate Analysis

- 514 Notifications received between FY18 – FY23
- 53 (10%) contested. Includes 48 Family Provision claims
- 13 (3%) known to CCCNSW (i.e., on our CRM)
 - 5 were clients
 - Max duration since last activity as 11 years
- Difficult to prove the impact of charity affidavits but it's important to be in the game.



Supporter Data Categories

| Supporter Category | Retention Period (from date of last activity) |
|---|--|
| Direct Supporters (Donors & Fundraisers) | 15 years |
| GIW Planners, Considerers and Confirms | 30 years |
| Indirect Donors | 5 years |
| Prospects (no giving history) | 2 years |
| Major Donors | 30 years |



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What is an “Activity”



Recognised Activities

- Donations
- Event Registrations
- Phone interactions
- Meetings
- Email click-thrus
- Form-fills (including surveys, profile updates)
- SMS replies (if possible)



Not Recognised

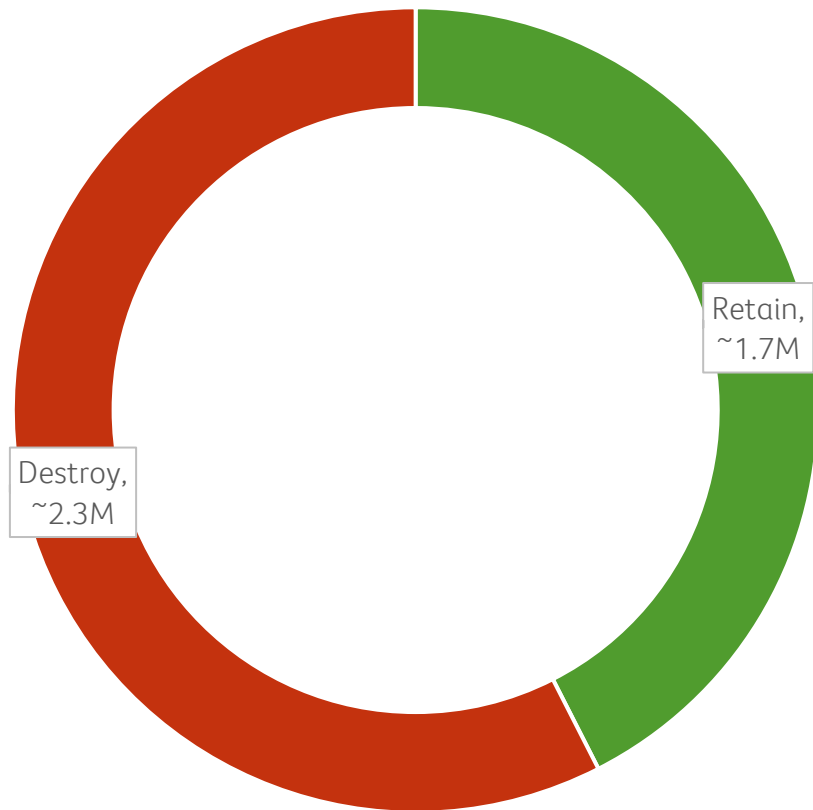
- Email/Mail sends
- Email opens? (under discussion)
- Unconnected Phone call attempts
- Unsubscribes
- Website page views



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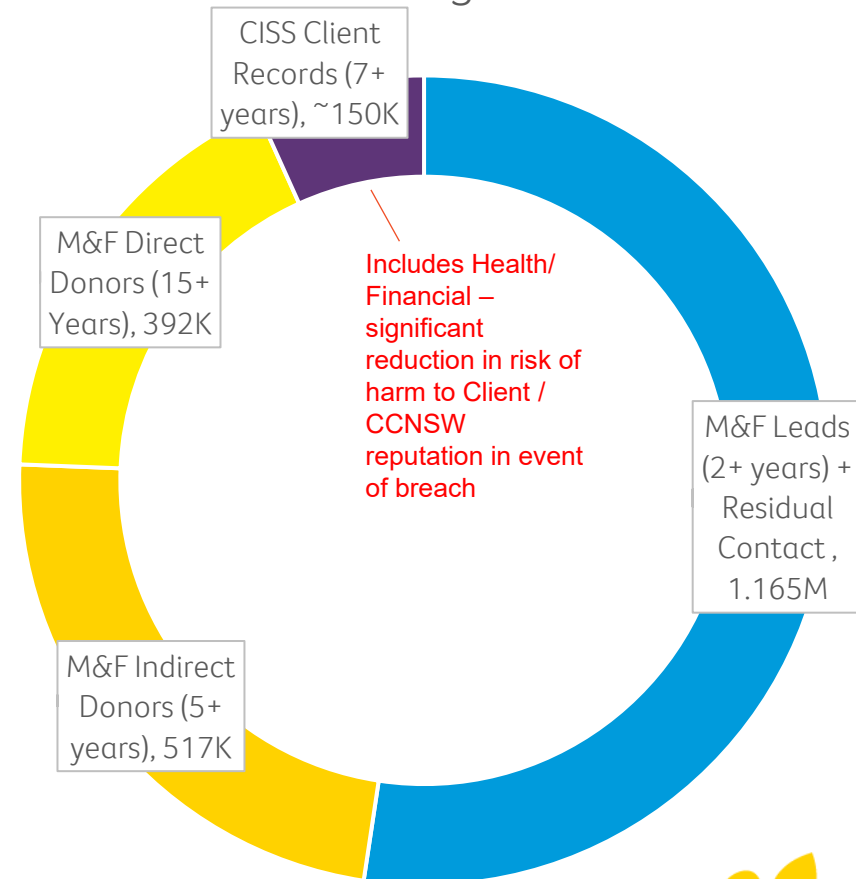
Initial Risk Reduction

Total Records with Personal Information (~4M)



Significant overall reduction in consequence to CCNSW in event of data breach

Initial Destruction Breakdown – Key Categories



Includes Health/Financial – significant reduction in risk of harm to Client / CCNSW reputation in event of breach

Limited justification for retaining this information under Privacy Act / Public Perception



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Implementation Considerations

- Complex Data Ecosystem with multiple Databases
- Deletion vs De-identification
- Cross-domain records (e.g., Supporter and Client)
- High development and testing effort. CRMs are not optimized for deletion.
- Automation/Repeatability



Conclusions

- Beware complacency; data breaches may seem routine, but their impacts can still be very harmful.
- A retain-everything policy is not defensible
- Data retention requirements are nuanced - Subject Matter Expertise is essential
- Implementation is hard, even when destruction rules are clear.
- Start conservative. Retention thresholds can be reduced later.



Questions?



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Thank you.



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