

Policy on Sending Electronic Direct Mail (EDM) on Behalf of Commercial or Organisational Partners

1. Purpose

Jesuit Communications is committed to being a sustainable multi-media ministry, trusted and valued as a 'go to' place for content and conversation advancing faith and justice. In order to help grow our community and become financially sustainable, we might occasionally seek to work with commercial and organisational partners. As part of these arrangements we might offer to send out an electronic direct main (EDM) on their behalf, with financial or similar promotional considerations (e.g. direct mail to their list, branding at their event) in return. While these partnerships might offer Jesuit Communications benefits in terms of promotional reach and financial sustainability, they must be undertaken in a way that maintains the trust and support of our audiences.

This policy establishes the principles and criteria governing when Jesuit Communications may send an EDM on behalf of a commercial or organisational partner. As a Catholic publishing organisation, our first priority is ensuring that any communication aligns with our values and serves the best interests of our audience. This policy also ensures compliance with privacy laws, anti-spam laws, and best practices for transparency and audience trust, and conformity with the Society's Instruction for the Administration of Finances (IAF).

2. Alignment with Organisational Values

Jesuit Communications will only send EDMs on behalf of commercial or organisational partners who:

- Align with and respect Catholic values and teachings.
- Offer products, services, or messages that are appropriate and beneficial to our audience.
- Do not engage in activities, advocacy, or messaging that contradict our mission and values.

Each potential EDM request will be reviewed by Jesuit Communications' Head of Publishing to assess alignment with the above criteria, and approved by the Provincial or Provincial's delegate, and Province Counsel, to ensure compliance with the IAF and other relevant legislation, before approval.

3. Privacy & Data Protection

Jesuit Communications is committed to safeguarding the privacy of our audience and ensuring compliance with all relevant privacy laws and regulations, including the Australian Privacy Act and the Spam Act.

- Each masthead's subscription terms and conditions include consent for Jesuit Communications to send information regarding products and services available through Jescom and its business partners, while assuring people can opt out of these communications.
- Any personal data collected as part of an EDM campaign must be handled in strict accordance with privacy laws. If the EDM includes a call to action requiring audience interaction (e.g., signing up for an event, making a purchase), the partner must provide a privacy policy outlining how they will handle any data collected. Any data collected must be handled in a manner consistent with Jescom and Province Privacy Policies.
- Commercial or organisational partners will **not** be given direct access to our audience's contact details. EDMs will be sent by Jesuit Communications on behalf of the partner.

4. Branding & Transparency

To maintain trust with our audience, all EDMs sent on behalf of commercial or organisational partners must:

- Clearly identify the message as a **commercial or promotional arrangement** at the beginning of the email.
- State that the message is being sent by Jesuit Communications on behalf of the business partner.
- Maintain a tone and design consistent with Jesuit Communications' brand and values, ensuring that the communication does not misrepresent our endorsement of the partner.

All EDM content, including text, imagery, and links, must be approved by Jesuit Communications Head of Publishing before distribution.

5. Audience Choice & Opt-Out Options

Jesuit Communications respects the right of our audience to control the communications they receive. Every EDM must include:

- A clear and simple opt-out link for recipients who do not wish to receive further partner emails.
- A statement clarifying that opting out of these emails will not affect their subscription to other communications from Jesuit Communications.

6. Review & Compliance

- This policy will be reviewed periodically to ensure ongoing alignment with best practices and legal requirements, including any updates to privacy and spam legislation.
- Any concerns or complaints regarding EDMs should be directed to Jesuit Communications Head of Publishing.
- Failure of a commercial or organisational partner to adhere to this policy may result in the termination of EDM collaborations.

7. Policy Approval & Implementation

This policy is effective as of 15 May 2025 and applies to all EDM campaigns involving commercial or organisational partners. Any exceptions must be approved by the Provincial or Provincial's delegate for communications.