

<b>PRIVACY POLICY</b>		Document # CEH 011	Print Date N/A
		Prepared By: Page Seager	Date Prepared: 16 July 2014
Effective Date: 15 May 2015	Revision # Version 2.1	Reviewed By: AOH GRC	Date Reviewed: 27 June 2019
Standard: Privacy Act 1988 (Commonwealth)		Approved By: GM, Housing Operations	Date Approved: 27 June 2019

### 1. Aim

Affordable Community Housing Alliance Tasmania Limited trading as “Centacare Evolve Housing (ABN 23 154 824 969)” (CEH) is committed to complying with its obligations under the *Privacy Act 1998 (Cth)* (**Privacy Act**), including the Australian Privacy Principles (**APPs**).

CEH is committed to respecting your privacy and protecting your rights with respect to your personal information.

### 2. Policy

This policy explains how CEH manages and secures your personal information. It also describes the kinds of personal information that CEH holds and for what purposes, and how that information is collected, held, used and disclosed.

This policy is available on CEH’s website at <http://centacareevolve.com.au/>. You may request a copy of the policy by contacting the Privacy Officer in accordance with paragraph 13 of this policy.

Please read this policy carefully before you provide CEH with any personal information.

### 3. Types of personal information that CEH collects and holds

#### *Personal information*

CEH may collect and hold the following types of personal information about you:

- a) identification information, including your name, postal address, email address, date of birth, Medicare number, driver’s licence, Centrelink number, passport and contact details;
- b) bank account details;
- c) financial transactions relating to your CEH accounts;
- d) balances of accounts held at CEH;
- e) tax file number;
- f) marital status; and
- g) any other information that CEH considers to be reasonably necessary.

#### *Sensitive information*

CEH may need to collect sensitive information about you. CEH will only collect sensitive information about you if:

- a) you consent to the collection of the information and the information is directly related to CEH’s functions; or
- b) the information relates:

- (i) to the activities of CEH; and
- (ii) solely to the members of CEH, or to individuals who have regular contact with CEH in connection with its activities; or
- c) the collection is otherwise permitted under the Privacy Act.

The types of sensitive information that CEH collects and holds about you may include:

- a) information or an opinion about your race or ethnic origin, religious beliefs or affiliations, philosophical beliefs, membership of a profession or trade association, membership of a trade union, sexual orientation and/or practices;
- b) criminal records; or
- c) health information.

#### *Information required by law*

CEH may also collect personal information about you because the collection of the information is required or authorised by law or a court/tribunal order.

#### **4. Collecting your personal information**

CEH will, if it is reasonable and practical to do so, collect personal information directly from you.

CEH may collect your information when you:

- a) give CEH information over the telephone;
- b) interact with CEH electronically or in person;
- c) access its website; and
- d) complete application forms.

On occasion CEH may collect personal information about you from other sources where it is necessary to do so. Examples of other sources that CEH may collect personal information from include, but are not limited to:

- a) schools;
- b) your relatives;
- c) CEH's service providers; and
- d) information that is publicly available on the electoral roll.

If you do not provide CEH with your personal information, it may not be able to:

- a) provide you with the product or service you want; and
- b) verify your identity.

#### *Unsolicited personal information*

If CEH inadvertently collects personal information about you that it did not ask for, CEH will check whether it could have collected that information itself. If CEH could have collected the information, CEH will handle it in the same way it handles other information it collects from you. If:

- a) CEH could not have collected the personal information; and
- b) the information is not contained in a Commonwealth record,

CEH will destroy the information or de-identify the information provided it is lawful and reasonable to do so.

#### **5. Storing personal information**

CEH stores your personal information in different ways, including paper and electronic form, via cloud and via Dropbox.

CEH treats all personal information as confidential. It will take reasonable steps to ensure personal information is protected from:

- a) misuse, interference and loss; and
- b) unauthorised access, modification and disclosure.

Some of the ways CEH does this are:

- a) confidentiality requirements for employees;
- b) document storage facilities;
- c) security measures for access to systems;
- d) only giving access to personal information to a person who is verified to be able to access that information;
- e) control of access to buildings; and
- f) electronic security systems, such as firewalls and data encryption, user identifiers, passwords or other access codes, antivirus, antispyware, backup and recovery of systems.

If CEH no longer needs your personal information for any purpose, it will take reasonable steps to destroy or permanently de-identify the information, unless:

- a) the information is contained in a Commonwealth record; or
- b) CEH is required by law, or a court/tribunal order, to retain the information.

## **6. Purpose for collecting, holding, using and disclosing information**

CEH collects, holds, uses and discloses your personal information for the following purposes:

- a) to assess your account application;
- b) to establish and administer your account;
- c) to verify your identity;
- d) to consider any other application made by you for products or services;
- e) for customer relations purposes, including managing CEH's relationship with you;
- f) to comply with any applicable laws, regulations or codes of practice;
- g) to comply with any payment systems requirements;
- h) for information technology systems development and testing where CEH's internal computer system is upgraded;
- i) for CEH's internal operations, including record keeping, risk management, auditing, training, file reviews and account analysis;
- j) to investigate, resolve and prevent complaints;
- k) to make arrangements with other organisations to provide services in relation to CEH's products and services (for example, CEH may arrange for mailing houses to distribute account statements);
- l) to conduct fraud assessments;
- m) for reporting and data analytics purposes, including for regulatory, management, statistical or research purposes;
- n) direct marketing purposes; and
- o) for any other purpose for which you have given your consent.

## **7. Use and disclosure of information**

Personal information CEH holds about you that was collected for a particular purpose will not be disclosed for another purpose, unless:

- a) you have consented to the use or disclosure of the information for another purpose; or
- b) the access, use or disclosure is otherwise permitted under the Privacy Act (e.g. you would reasonably expect CEH to use or disclose the information for another purpose or the use or disclosure of the information is required or authorised by law or a court/tribunal order).

CEH may disclose personal information about you to third parties. Examples of third parties that CEH may disclose your personal information to include, but are not limited to:

- a) CEH's service providers;
- b) CEH's agents, contractors and external advisors (for example, CEH lawyers, auditors and Catholic Development Fund Tasmania);
- c) any person acting on your behalf, including your legal and financial advisers;
- d) Government and other regulatory bodies, law enforcement bodies and courts as required or authorised by law;
- e) external dispute resolution bodies;

- f) other financial institutions; and
- g) any other person where you have given your consent.

CEH is not likely to disclose your personal information to any overseas recipients.

Where your personal information is disclosed, CEH will seek to ensure that information is used, held and disclosed consistently with the Privacy Act and any other applicable laws.

## **8. Direct marketing**

CEH may use or disclose your personal information (excluding sensitive information) for direct marketing purposes. CEH may conduct direct marketing via email, telephone, mail out or any other electronic means.

CEH will only use your sensitive information for the purposes of direct marketing if you have consented to the information being used or disclosed for the purposes of direct marketing.

If at any time you decide you do not want to receive any more marketing material from CEH, you may:

- a) contact the Privacy Officer in accordance with paragraph 13 of this policy; or
- b) opt-out of receiving any more marketing material via any opt-out mechanism contained in CEH's marketing correspondence.

All CEH's marketing correspondence will display a clearly visible and user-friendly opt-out mechanism. CEH may imply consent to receive direct marketing material if you do not use the opt-out mechanism.

If you request to no longer receive direct marketing material CEH will process your request within a reasonable period after the request is made.

## **9. Quality of personal information**

CEH will take all reasonable steps to ensure that any personal information it collects, uses or discloses is accurate, complete, up-to-date and relevant to CEH's functions or activities.

If you believe that your personal information is not accurate, complete or up to date, you should contact the Privacy Officer in accordance with paragraph 13 of this policy.

## **10. Access to personal information**

You can access your personal information unless an exception in the Privacy Act applies.

You can request access to your personal information by contacting the Privacy Officer in accordance with paragraph 13 of this policy.

Depending on the nature of the request, CEH may charge you a small fee for granting you access.

CEH will respond to a request for access within a reasonable time (usually 30 days), and give access in the manner requested by you, if it is reasonable and practicable to do so.

Sometimes, it may not be possible for CEH to give you access. If CEH refuses to give you access, it will:

- a) take reasonable steps to give you access in a manner that meets CEH's needs as well as yours;
- b) provide you with written reasons for the refusal provided it is reasonable to do so; and
- c) provide you with the mechanisms available to complain about the refusal.

## **11. Correcting personal information**

If you think that any personal information CEH holds about you is incorrect, inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request CEH to correct the information by contacting the Privacy Officer in accordance with paragraph 13 of this policy.

CEH will take all reasonable steps to correct that information to ensure that, having regard to the purposes for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If CEH corrects personal information that has been disclosed to another entity and you ask CEH to tell the other entity about the correction, CEH will take all reasonable steps to tell the other entity about the correction, unless it is impractical or unlawful to do so.

If CEH refuses to correct the personal information, then it will provide you with:

- a) written reasons for the refusal provided it is reasonable to do so; and
- b) the mechanism available to complain about the refusal.

CEH must respond to a correction request within a reasonable time (usually 30 days).

## 12. Anonymity

You have the option to remain anonymous, or to use a pseudonym when dealing with CEH where it is lawful and practical to do so.

## 13. Data Breach

A Data Breach is an incident where personal or confidential information, or non-personal information that could be sensitive or commercial is compromised, disclosed, copied, transmitted, accessed, removed, destroyed, stolen or used by unauthorised individuals, whether accidentally or intentionally.

CEH is obligated under the Australian *Privacy Amendment (Notifiable Data Breaches) Act 2017* to notify individuals whose personal information is involved in a data breach that could potentially result in serious harm.

## 14. Complaints or queries

If you:

- a) have any issues about the way CEH handles your personal information after reading this policy;
- b) become aware of a potential breach of privacy; or
- c) wish to make a privacy complaint,

you are requested to contact the CEH Privacy Officer at:

CEH Privacy Officer

Email: [privacyofficer@aohtas.org.au](mailto:privacyofficer@aohtas.org.au)

Telephone: (03) 6208 6222

Post: Shop 2, 28 Green Point Rd, Bridgewater, TAS, 7030

Visit: 35 Tower Road, New Town, TAS, 7008

If CEH's Privacy Officer is unable to resolve the matter, it will be escalated (internally or externally) as appropriate to facilitate resolution.

If you are not happy with the outcome of CEH's Privacy Officer's investigation, then you can raise your concern with the Office of the Australian Information Commissioner (**OAIC**):

Office of the Australian Information Commissioner

Telephone: 1300 363 992

Email: [enquiries@oaic.com.au](mailto:enquiries@oaic.com.au)

Mail: GPO Box 5218 Sydney NSW 2001

Web: [www.oaic.gov.au](http://www.oaic.gov.au)

## Changes to this policy

CEH will review this policy from time to time. CEH encourages you to check its website regularly for any updates to this policy.