

# PRIVACY POLICY

## FINAL

### 1 Purpose and Objective

Housing Plus and Plus Community (or **we, us** or **our**) deals with information privacy in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (**APPs**) set out in the Privacy Act.

This Privacy Policy sets out our policies in relation to management of personal information.

### 2 Scope

- a. This policy applies to all Employees, Management and Other Stakeholders including Volunteers of Housing Plus and Plus Community.
- b. This policy describes the organisation's objectives and policies regarding privacy.

### 3 References

- a) Privacy Act 1988 (Cth)
- b) National Standards: Australian Privacy Principles (APPs)
- c) Privacy and Personal Information Protection Act 1998 (NSW)
- d) NSW Standards: Information Privacy Principles (IPPs)

### 4 Definitions

**Term:** Personal Information

**Definition:** Means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- Whether the information or opinion is true or not; and
- Whether the information or opinion is recorded in a material form or not.

**Term:** Sensitive Information

**Definition:** Sensitive information is a subset of personal information and includes:

- Racial or ethnic origin;
- Political opinions;
- Religious beliefs or affiliations;
- Sexual preferences or practices;

- Criminal records; or
- Health information about an individual.

**Term:** Notifiable Data Breach

**Definition:** A data breach that is likely to result in serious harm to any individuals to whom the information relates.

## 5 Policy

### 5.1 What kinds of personal information we collect and store?

We collect and hold:

- Your contact details, such as office address, home address, telephone numbers and email address.
- Your personal details, such as date and place of birth, gender, qualifications, titles, whether or not you are Aboriginal or Torres Strait Islander, the languages you speak.
- Your employment details, such as your employment history, information relating to any complaints received and any disciplinary investigations or other action.
- Your browsing history on the Housing Plus and/or Plus Community website and our SharePoint intranet or apps downloadable on smartphones or tablets (together, the **Sites**).
- Any criminal record or medical information to the extent that it is relevant to our functions and responsibilities under and authorised by Housing Plus or Plus Community and the Community Housing Sector.
- Records of your communications and other interactions with us.

In this Privacy Policy we refer to this as your personal information.

### 5.2 How do we collect and hold your Personal Information?

We generally collect your personal information directly from you, including when you use the Housing Plus or Plus Community website or our SharePoint intranet or other apps downloadable on smartphones or tablets. However, in some cases, we may receive your personal information from a third party (for instance if we receive a complaint relating to your conduct) or when it is relevant to our statutory responsibilities (for instance other regulators or government entities who have dealt with you).

### 5.3 What would happen if we did not collect your Personal Information?

Without your personal information we may not be able to process your requests, perform our statutory functions or provide you with some or all of our products and services.

## 5.4 What are the purposes for which we collect and hold your Personal Information?

### We collect and hold your Personal Information to:

1. Fulfil our functions and responsibilities under Commonwealth and State legislation and associated regulations (which require and authorise us to collect certain information) including:
  - Maintaining regulatory and corporate records.
  - Undertaking investigations and implementing disciplinary procedures associated with professional responsibility; and
  - Providing information to Australian regulators and government entities and to overseas regulators where applicable.
2. Fulfil our role as a Community Housing Provider and a Community Services Provider and to uphold our charitable mission including:
  - To provide services.
  - To run Housing Plus and Plus Community's business and operations
  - To communicate and manage our relationship with customers
  - To assist employees in providing services to customers and assess eligibility for services and support for potential customers.
  - For administrative requirements including updating and maintaining records, analysing data and providing information to Housing Plus' Insurers.
  - To prevent or detect fraud.
  - To provide information to law enforcement, legal advisors and government agencies at all levels.
  - To provide information to Housing Plus and Plus Community's support partners and health providers who provide follow up and ongoing services to our customers.
  - To comply with government and other reporting requirements that apply.
3. Analyse your interaction with our personal and electronic services. The information collected from you may be analysed individually and/or aggregated with the information relating to other members to produce statistical information. Insights from this process are used to select and optimise the information, services and advertising we provide to you; and
4. Use information and/or provide information to third parties as authorised or required by law.

## 5.5 Use and Disclosure of your Personal Information

We do not use your personal information or disclose it to another organisation unless:

- It is reasonably necessary for one of the purposes described above;
- Having regard to the nature of the information or the circumstances of collection we believe you would expect us to use the information or make the disclosure;

- Required or authorised by law or court or tribunal;
- It is necessary to protect the rights, property, health or personal safety of the public or our interests, and it is unreasonable or impracticable to obtain your consent;
- The disclosure is necessary to assist any entity, body or person to locate a person who has been reported missing;
- We have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in, and we believe that the collection, use or disclosure is necessary in order for us to take appropriate action;
- The assets and operations of our business are transferred to another party as a going concern;
- It is necessary to obtain third party services, for example to carry out data analysis or provide information processing services. The use of your information by third parties is strictly controlled; or
- It is for one of the purposes expressly permitted under the Privacy Act.

### **Disclosure Overseas**

We may disclose personal information to our contracted information technology service providers that are hosted offshore.

### **If you do not want your personal information to be disclosed**

If you do not want your personal information to be disclosed (for instance, you want to have your name excluded from our mailing lists) you should advise us in writing. We will accommodate your request provided that the disclosure is not required by law.

## **5.6 Storage and security of personal information**

We take all reasonable precautions to protect the personal information we hold from misuse, loss, unauthorised access, modification, or disclosure.

Where practicable we implement measures to require organisations to whom disclosure is made to comply with the Privacy Act. If a third party is given access to personal information, we take reasonable steps to ensure that the information is held securely and used only for the purpose of providing the relevant service or activity.

We hold personal information in both hard copy and electronic formats. Paper files are stored in secure cabinets onsite. They may also be archived in boxes and stored offsite in secure facilities.

You can also assist us in keeping your personal information secure by maintain the confidentiality of your account passwords and notifying us immediately if there is any unauthorised use of one of your accounts by another Internet user or any other breach of security relating to one of your accounts or your use of our websites.

The steps we take to secure the personal information we hold includes but is not limited to:

- Website protection measures (such as encryption, firewalls, and anti-virus software).
- Access restrictions to our computer systems (such as login and password protection).

- Restricted access to our office premises.
- Staff training and implementation of workplace policies and procedures that cover access, storage, and security of information.

## 5.7 Linked websites

This Privacy Policy does not apply to linked websites. Links to third party websites that are not operated or controlled by Housing Plus or Plus Community are provided for your convenience. We are not responsible for the privacy or security practices of those websites. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

## 5.8 Access and Corrections to your Information

You have the right to access your personal information unless we are permitted by law to withhold that information. Any requests for access to your personal information should be made to Housing Plus Privacy Officer (see "Contacting Us" heading below) in writing.

We will take reasonable steps to correct your personal information if we are satisfied that it is inaccurate, out of date, incomplete, irrelevant, or misleading. If we have provided your personal information to third parties, we will also notify them of the correction if you ask us to do so, unless it is impracticable or unlawful.

Requests to access and correct your information should be made by email, post or phone using the details provided under the 'Contacting Us' heading. Please note that we will need to verify your identity before processing your request. We will endeavour to respond to your request within 30 days.

If we do not agree with your request to access or correct your information, we will provide you with written reasons for our decision and available complaint mechanisms.

## 5.9 Complaints and Further Information

If you require any further information about our management of personal information or have a complaint about our handling of your personal information, you should write to the Housing Plus and Plus Community Privacy Officer, who will respond to you within a reasonable time, usually 30 days.

If you are not satisfied with the outcome of your complaint you may contact us further to advise of your concerns and, if we are unable to reach a satisfactory resolution you may write to the Office of the Australian Information Commissioner (OAIC) at <https://www.oaic.gov.au/privacy/privacy-complaints/> or the Information and Privacy Commission NSW at <https://www.ipc.nsw.gov.au/>.

## 5.10 Contacting Us

All privacy related contact should be through the Housing Plus and Plus Community Privacy Officer. You can contact the Privacy Officer in the following ways:

- In writing to:

Attn: Privacy Officer – Housing Plus

**Mail:** PO Box 968 ORANGE NSW 2800

or

Attn: Privacy Officer – Housing Plus

**Email:** [info@housingplus.com.au](mailto:info@housingplus.com.au)

- By phone:

**Telephone:** 1800 603 300 and ask to speak with our Privacy Officer.

## 6 DOCUMENT CONTROL

### 6.1 Document History

Action	Responsible Person	Date
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