



Privacy Policy

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ABOUT THIS POLICY

Regional Housing Limited is committed to respecting your privacy and protecting your personal information. We collect, hold, use and disclose personal information to carry out the functions and activities of our organisation.

We are bound by the *Privacy Act 1988*, the Australian Privacy Principles and any other relevant privacy laws and legislation.

In accordance with the *Privacy Act 1988*, we are required to have a Privacy Policy to outline the personal information handling practices of Regional Housing Limited. This Privacy Policy will be reviewed and updated as required. The current version can be accessed via our website or by contacting our office to request a copy.

KEY DEFINITIONS

The Act defines ‘personal information’ as:

“Information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a) whether the information or opinion is true or not; and
- b) whether the information or opinion is recorded in a material form or not.”

In this Privacy Policy, unless otherwise specified, the following definitions will apply:

Act – Privacy Act 1988 or any replacement law.

RHL – Regional Housing Limited.

RHL Website – a website or mobile application owned or operated by RHL.

APP – the Australian Privacy Principles contained in Schedule 1 of the Act.

Authorised Representative – any person authorised to act on behalf of RHL e.g. employees, contractors, Directors, volunteers.

Policy – this RHL Privacy Policy document.

COLLECTION OF YOUR PERSONAL INFORMATION

DIRECT COLLECTION

Where possible, we will only collect personal information directly from you e.g. when you contact us by telephone, online communication, submitting an application etc.

The type of personal information we collect will depend on the activity required. Common types of information collected include:

- Name
- Contact details (phone, address, email etc.)
- Date of birth
- Gender
- Employment and income details



In some circumstances we will need to obtain sensitive information about you. Sensitive information will only be collected where it is reasonable to do so and may include:

- Medical information
- Criminal history and court orders
- Disability information
- Racial or ethnic origin
- Living and household circumstances

INDIRECT COLLECTION

We may obtain your personal information from other people (e.g. referring agencies, service providers etc.) to enable us to provide you with a service or carry out a required activity. Indirect collection of your personal information will only occur where you would reasonably expect it e.g. requesting a referral to our services or housing

ANONYMITY

There may be times where we do not require your personal information and you can interact with us anonymously or by using a pseudonym e.g. when calling to make a general enquiry. However, if we ask for your personal information and you don't give it to us we may not be able to provide you with any, some, or all of the services we provide. This may also impact on how you can engage with our organisation.

UNSOLICITED INFORMATION

Information we receive about you without actively seeking to collect it, is considered unsolicited information. Where we have received unsolicited information we will determine if the information could be obtained through our usual methods of collection.

Where the unsolicited information could not have been collected by usual methods we will destroy or de-identify the information as soon as practicable, if lawful and reasonable to do so.

Where the unsolicited information could have been collected by usual methods we will handle and manage it in the same way we handle personal information we have requested.

ONLINE COLLECTION OF INFORMATION

RHL WEBSITE AND COOKIES

RHL may collect information about you when you access our website by using cookies. Cookies are small data files stored on a user's computer and provide us with information to fulfil your request and improve your online experience. Information collected by cookies can include:

- Your device's IP address
- Device screen size
- Device type, operating system and browser information
- Geographic location
- Referring domain and out link if applicable
- Search terms and pages visited
- Date and time when website pages were accessed



Most internet browser preferences allow you to accept or block the use of cookies. Please be aware that blocking all cookies could affect your ability to access our website.

Our website contains links to other sites which are outside of our control and are not covered by this policy. RHL is not responsible for the privacy practices of linked websites and if you access other sites using the links provided, the operators may collect personal information from you. We encourage you read the Privacy Policies on other websites you visit.

CONTACTING US ONLINE

Our website provides you with the ability to contact us by completing an online form to make a general enquiry about services, provide feedback and lodge complaints. When completing an online form to make a general enquiry you will be required to include your name and phone number. This information will be used to contact you with a response. The online form to provide feedback or lodge a complaint can be submitted anonymously, however please be aware that other information may be collected as described in 'RHL WEBSITE AND COOKIES'. Once you submit your online form it is automatically emailed to us and immediately discarded from the website.

SOCIAL NETWORKING SITES

We use social media to engage with the community. If you choose to interact with us through social media e.g. Facebook, we may collect your personal information to assist us to communicate with you. Your personal information will also be handled by the social networking site for their purposes and we encourage you read their relevant Privacy Policies.

USE AND DISCLOSURE

Your consent to disclose your personal information will be obtained either at the time you engage with us or as soon as practicable. You can request to modify or withdraw your consent at any time. We will only use and disclose your personal information for the primary purpose it was collected or for a secondary purpose.

Examples of primary purposes	Examples of secondary purposes
To verify your identity Understanding your needs and provide you with housing or a support service Establishing and managing records of clients, tenants, employees, contractors etc. Managing feedback and complaints Keeping you informed by distributing correspondence	Where you have provided consent to use and disclose for a secondary purpose Any related purpose that you would reasonably expect us to use or disclose it for As permitted under this Privacy Policy or under law. Where a permitted general situation exists, as defined by the Act

Where required, your personal information will be accessible to Authorised Representative/s. Third parties associated with us could also have access to your information to carry out relevant services, for example:

- Government Departments
- Contractors and Consultants
- Statutory or Regulatory bodies
- Finance and Insurance providers
- IT service providers
- Information storage providers
- Lawyers, Accountants and Auditors



Where applicable, RHL will take reasonable steps to ensure we have contracts in place that contain an obligation for third parties to comply with the Act and this Privacy Policy.

DIRECT MARKETING

Your personal information will not be used for direct marketing unless you would reasonably expect us to do so. Where we have used your information for direct marketing you will be provided with the opportunity to opt out.

CROSS BORDER DISCLOSURES OF YOUR PERSONAL INFORMATION

Your personal information will not be disclosed overseas without your consent, however we may use information storage providers who are based overseas e.g. cloud storage providers. When using this type of service we will take reasonable steps to ensure information is kept secure and the recipient complies with the Australian Privacy Principles or similar privacy principles.

QUALITY OF PERSONAL INFORMATION

To ensure your personal information is accurate, complete and up to date we will take reasonable steps to maintain the quality of your information. This includes:

- Implementing systems and procedures to audit and identify where corrections are required
- Ensuring consistent methods are used to collect and record your information
- Any updates to your information are applied to records as soon as practicable
- Contacting you to identify any changes to your information

STORAGE & SECURITY OF PERSONAL INFORMATION

Your information may be held in a variety of methods e.g. hard copy files, computer databases or systems and on mobile phones. We may also store your information in a cloud or other type of networked or electronic storage.

We take reasonable steps to protect your personal information from misuse, interference, loss and unauthorised accessed. These steps include:

- Regular training provided to staff regarding privacy practices and obligations
- Assigning different levels of access and permissions on computer system profiles and databases
- Locking of hard copy storage cabinets with limited access to sensitive information
- Security measures on buildings to prevent unauthorised access
- Verifying an individual's identity prior to disclosing personal information
- Privacy and confidentiality agreements signed by all Authorised Representatives
- Security software installed on all computers to prevent threats e.g. viruses, malware etc.

Regardless of the above, you should be aware that no data protection and security measure is completely secure. You should notify us as soon as possible if you become aware of or suspect a security breach.

HOLDING YOUR INFORMATION

We will retain your personal information until our legal obligations have expired or we no longer need your information for the purpose it was collected. At this time we take reasonable steps to destroy or de-identify your personal information.



DATA BREACHES

A data breach occurs when personal information is accessed or released without authorisation, or is lost. RHL will take seriously and promptly handle any incident involving a suspected or known data breach. Our response to a data breach will include the following steps:

- Contain – limit further access or distribution of personal information
- Assess – Identify if the breach is likely to result in serious harm to any individuals whose information was involved
- Notify – Where serious harm is likely we will notify the Commissioner and affected individuals
- Review – The incident will be reviewed and actions identified to prevent future data breaches

ACCESSING OR CHANGING YOUR PERSONAL INFORMATION

You can request to access your personal information held by us or request changes to be made to your personal information. You can do this by contacting our office or submitting a Personal Information Request Form.

Your request will be processed in a reasonable timeframe. Please be aware reasonable costs to supply this information may apply.

If we do not provide you with access or refuse to update your information, you will be notified. Where appropriate, we will provide you with the reason for the decision.

CONTACT US

If you have any questions or would like further information please don't hesitate to contact us. If you wish to make a complaint about how we have handled your personal information please contact our Chief Executive Officer.

Our contact details are:

In person	30 Tantitha Street, Bundaberg QLD 4670 (Head Office)
By post	PO Box 540
Email	info@regionalhousing.org.au
Phone	07 4153 1239 or 1300 642 123

We are committed to respecting your privacy and we will respond to you as soon as reasonably possible. If you feel your complaint has not been resolved you may contact the Office of the Australian Information Commissioner on the following details:

By post	GPO Box 5218, Sydney NSW 2001
Email	enquiries@oaic.gov.au
Phone	1300 363 992
Website	www.oaic.gov.au