

PRIVACY POLICY		Document # CCT-024	Print Date N/A
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Compliance: Privacy Act 1988 (Commonwealth) Australian Privacy Principles Personal Information Protection Act 2004 (Tasmania)		Approved By: Chief Executive Officer	Date Approved: 14/08/2023

1. Aim

CatholicCare Tasmania (ABN 79 984 899 862) (CCT) is a division of the Roman Catholic Church Trust Corporation of the Archdiocese of Hobart. It is committed to complying with its obligations under the *Privacy Act 1998 (Cth)* (Privacy Act), including the Australian Privacy Principles (APPs) and the *Personal Information Protection Act (Tas)* (PIP act).

CCT is committed to respecting people’s privacy and protecting their rights with respect to personal information.

2. Policy

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

This policy is available on CCT’s website at catholiccaretas.org.au. Anyone can request a copy of the policy by contacting the Privacy Officer in accordance with paragraph 15 of this policy.

Any person giving personal information to CCT should be familiar with this policy before doing so.

3. Types of personal information that CatholicCare collects and holds

3.1 Personal information

CCT may collect and hold the following types of personal information about a person:

- a) identification information, including 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 their CCT accounts;
- d) balances of accounts held at CCT;
- e) tax file number;
- f) marital status; and
- g) any other information that CCT considers to be reasonably necessary.

3.2 Sensitive information

CCT may need to collect sensitive information about a person. CCT will only collect sensitive information about a person if:

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

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

The types of sensitive information that CatholicCare collects and holds about a person may include:

- a) information or an opinion about their 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

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

4. Collecting personal information

CatholicCare will, if it is reasonable and practical to do so, collect personal information directly from the relevant person.

CatholicCare may collect information when a person:

- a) gives CatholicCare information over the telephone;
- b) interacts with CatholicCare electronically or in person;
- c) accesses its website;
- d) completes an application for employment; and
- e) completes program or service required forms.

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

- a) schools;
- b) relatives;
- c) Business partners and other Agencies;
- d) Services Australia; and
- e) information that is publicly available on the electoral roll or other registers.

If a person does not provide CatholicCare with their personal information, it may not be able to:

- a) provide the product or service that person wants; and
- b) verify that person's identity.

Unsolicited personal information

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

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

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

5. Storing personal information

CatholicCare stores personal information in different ways, including paper, electronically in its computer management system and cloud-based storage. CatholicCare retains effective control over any personal

information held on a cloud, and the information is handled in accordance with the Australian Privacy Principles.

CatholicCare 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 CatholicCare 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 CatholicCare no longer needs someone's 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) CatholicCare is required by law, or a court/tribunal order, to retain the information.

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

CatholicCare collects, holds, uses and discloses a person's information for the following purposes:

- a) to assess someone's account application;
- b) to establish and administer an account;
- c) to verify a person's identity;
- d) to consider any other application made for products or services;
- e) for customer relations purposes, including managing CatholicCare's relationship with a person;
- 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 CatholicCare's internal computer system is upgraded;
- i) for CatholicCare'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 CatholicCare's products and services (for example, CatholicCare 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 a person has given their consent.

7. Use and disclosure of information

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

- a) the person has 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., the person would reasonably expect CatholicCare 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).

CatholicCare may disclose personal information about a person to third parties. Examples of third parties that CatholicCare may disclose personal information to include, but are not limited to:

- a) CatholicCare's service providers;
- b) CatholicCare's agents, contractors and external advisors (for example, CatholicCare lawyers, auditors and the Office of the Australian Information Commissioner);
- c) any person acting on a person's behalf, including 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; and
- f) any other person where a person has given their consent.

CatholicCare is not likely to directly disclose personal information to any overseas recipients. When personal information is disclosed, CatholicCare will seek to ensure that information is used, held and disclosed consistently with the Privacy Act and any other applicable laws.

8. Direct marketing

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

CatholicCare will only use sensitive information for the purposes of direct marketing if a person has consented to the information being used or disclosed for the purposes of direct marketing.

If at any time a person decided they do not want to receive any more marketing material from CatholicCare, they may:

- a) contact the Privacy Officer in accordance with paragraph 15 of this policy; or
- b) opt-out of receiving any more marketing material via any opt-out mechanism contained in CatholicCare's marketing correspondence.

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

If someone requests to no longer receive direct marketing material CatholicCare will process the request within a reasonable period after the request is made.

9. Web Analytics

Data is collected through access to CatholicCare's website to improve the experience when using its site. CCT also uses this data to understand and report on which content pages and downloads are accessed by visitors.

CCT uses social networking sites such as Facebook, Instagram and LinkedIn to communicate with the public about its work. When someone communicates with CCT using these services, CCT may collect personal information, but will only use it to help it to communicate with the person and the public. The social networking service will also handle personal information for its own purposes, they have their own privacy policies which a person can access on their websites.

10. Quality of personal information

CatholicCare 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 CatholicCare's functions or activities.

If someone believes that their personal information is not accurate, complete or up to date, they should contact the Privacy Officer in accordance with paragraph 15 of this policy.

11. Access to personal information

A person can access their personal information unless an exception in the Privacy Act applies. They can request access to their personal information by contacting the Privacy Officer in accordance with paragraph 15 of this policy.

Requesting personal information is free. However, CatholicCare might need to charge a small fee for providing access. If this is the case, CCT will let the person know there is a charge and explain the reasons for it and work with them to reduce this fee as much as possible.

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

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

- a) take reasonable steps to give access in a manner that meets the needs of both parties;
- b) provide written reasons for the refusal provided it is reasonable to do so; and
- c) provide the mechanisms available to complain about the refusal.

12. Correcting personal information

If someone thinks that any personal information CatholicCare holds about them is incorrect, inaccurate, out-of-date, incomplete, irrelevant or misleading, they may request CatholicCare to correct the information by contacting the Privacy Officer in accordance with paragraph 15 of this policy.

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

If CatholicCare refuses to correct the personal information, then it will provide:

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

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

13. Anonymity

Any person has the option to remain anonymous, or to use a pseudonym when dealing with CatholicCare where it is lawful and practical to do so.

14. Data Breach

CCT is committed to complying with its data breach reporting obligations. CCT will notify affected individuals and the OAIC when a data breach is likely to result in serious harm to an individual whose personal information is involved in accordance with its obligations under the Privacy Act.

15. Complaints or queries

If you:

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

please contact the CatholicCare Privacy Officer at:

CatholicCare Privacy Officer

Email: catholiccare.privacyofficer@aohtas.org.au
Telephone: (03) 6278 1660
Post: PO Box 369, Moonah, TAS 7009
Visit: 35 Tower Road, New Town, TAS 7008

If CatholicCare'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 CatholicCare'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
Web: <https://www.oaic.gov.au/>
Mail: GPO Box 5288, Sydney, NSW 2001
Email: enquiries@oaic.com.au

Changes to this policy

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