



2.3 PRIVACY POLICY

Applies to: All	Version: 1.0
Date Approved:	Approved by: WESTIR Board
Reviewer: Administration & Executive Officer	Review Date:

Introduction

WESTIR Ltd is committed to protecting the privacy of personal information which it collects, holds, analyses and administers. We recognise that is the essential right of individuals to have their information administered in ways which protects them on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the Privacy Act 1988 (Cth).

At WESTIR Ltd (we) recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. Although personal information can be recorded in the process of completing our projects, WESTIR often relies on aggregate data supplied from third parties. This document is our Privacy Policy, and it tells you how we collect and manage your personal information. In circumstances where your personal information is recorded, we ensure that all such data is stored securely in our server until it is no longer required for the project.

We respect your rights to privacy under the Privacy Act 1988 (Cth) (Act) and we comply with all of the Act's requirements in respect of the collection, management and disclosure of your personal information.

Purpose

The purpose of this Policy is to provide a framework for WESTIR Ltd in dealing with privacy considerations.

What is the objective of the policy?

In particular, the objects of this policy are to inform:

- a) the community about how their personal information will be used, stored and accessed after it is collected by WESTIR; and
- b) members of WESTIR staff of their obligations in relation to handling personal information and when they can and cannot disclose, use or how this data is collected.



Definitions

A privacy policy is a statement that explains how an organisation or agency handles and collects your personal information.

'Personal information' is defined in the Privacy Act as:

“personal information means 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.”

The phrase “reasonably identifiable” deals with the concept of data matching. Data matching occurs where data about an unidentified individual is linked or matched with other data with the effect of causing the individual to become identified.

'Sensitive information' is a special category of personal information and is subject to stricter legal requirements for collection, storage, use and disclosure. Information is 'sensitive information' if it's information or an opinion about a person's, racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, or criminal records.

'Health information' is generally afforded a higher level of protection under Privacy Laws. 'Health information' includes information or opinions about a person's physical and mental health, disability (at any time), health preferences (including future provision of health services), use of health services, bodily donations (for example, blood, organs), and genetics.

As with employee records:

Under the Privacy Act the Australian Privacy Principles do not apply to employee records. As a result, this Privacy Policy does not apply to the WESTIR's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between WESTIR Ltd and the employee.

The other Acts that may affect us are:

Government Information (Public Access) Act 2009 (GIPA Act 2009)

The GIPA Act 2009 gives members of the public a legally enforceable right to access government information except when, on balance, it would be contrary to the public interest to provide that information.

The GIPA Act 2009 helps members of the public by making government information more accessible. It does this by:

- Requiring government agencies to make certain types of information openly available
- Encouraging government agencies to proactively release as much other information as possible
- Providing the public with the enforceable rights to make both an informal and formal request for government information



- Restricting access to information only when there is an overriding public interest against disclosure

WHAT IS YOUR PERSONAL INFORMATION?

When used in this Privacy Policy, the term “personal information” has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

We may collect some of the following types of personal information for employment and governance matters:

- full name;
- mailing and/or street address;
- email address;
- telephone number;
- fax number;
- organisation which you are from;
- job title;
- taxation details where applicable
- banking details
- organisation and research participants
- details of the services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those and services and to respond to your enquiries;
- information you provide to us through surveys or visits by our representatives from time to time.
- any additional information relating to you that you provide to us directly through our or indirectly through our representatives or otherwise;
- the kind of membership you hold with WESTIR Ltd

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about certain topics of interest in which WESTIR Ltd is researching about.



HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- through your access and use of our website;
- through forms and surveys we provide to you;
- during conversations between you and our representatives;
- email correspondence, where we request or you provide information;
- applications submitted to our organisation;
- through third party companies who have opted to provide us with your information in conjunction with projects and/or works commissioned to us through WESTIR's requirements under de-identified data collection government funding.

WHAT HAPPENS IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION?

If we are not able to collect your information we may:

- not be able to provide the requested service to you, either to the same standard or at all;
- we may not be able to provide you with information about the services that you may want, such as recent publications, notification of data releases or all relevant updates applicable to your membership with us
- to provide products and services to you and to send communications requested by you;
- to answer enquiries and provide information or advice about existing services;
- to provide you with access to protected areas of our website;
- to conduct business processing functions including providing personal information to our contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of WESTIR Ltd, contractors or service providers;
- to provide your updated personal information to our contractors or service providers;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you;
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country.

TO WHOM MAY WE DISCLOSE YOUR INFORMATION?

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy. We may disclose your personal information to:

- our employees, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic



network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;

- collection of de-identified data
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- any organisation for any authorised purpose with your express consent.
- legislative or legal government requirements

We may combine or share any information that we collect from you with information collected from our own sources or other sources provided to us.

DIRECT MARKETING MATERIALS

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various surveys, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list as promptly as possible. There may be a delay in getting back to you

We do not provide your personal information to other organisations for the purposes of direct marketing.

HOW CAN YOU ACCESS AND CORRECT YOUR PERSONAL INFORMATION?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). You will need to provide appropriate identification and outline what personal information you require access to and submit it for review. Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We will not charge for simply making the request and will not charge for making any corrections to your personal information. If charges do apply for any request, you will be notified before charges are applied.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.



WHAT IS THE PROCESS FOR COMPLAINING ABOUT A BREACH OF PRIVACY?

WESTIR deals with privacy complaints directly. Any complaint should be directed to us using the contact details below. You must provide details of the incident so that we can investigate it accordingly.

We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating staff member and the estimated completion date for the investigation process.

After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

DO WE DISCLOSE YOUR PERSONAL INFORMATION TO ANYONE OUTSIDE AUSTRALIA?

We may disclose personal information to our related third party suppliers and service providers locally for some of the purposes listed above.

We take reasonable steps to ensure that the local recipients of your personal information do not breach the privacy obligations relating to your personal information.

We do not intentionally disclose personal information to entities located outside of Australia.

SECURITY

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. WESTIR uses the latest internet security software to protect your personal information, and partners with only trusted providers to secure all data from malicious access and misuse. WESTIR does not distribute the personal information of individuals and does not provide personal information upon request without appropriate identification and review. We may hold your information in either electronic or hard copy form until that information is deemed redundant. Personal information is destroyed or de-identified when no longer needed. Destruction time-frames will be decided upon any legislative requirements.

The internet is inherently unsecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet.

Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

LINKS



Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

CONTACTING US

If you have any questions about this Privacy Policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact us using the details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact the office of WESTIR Ltd on:

Post: Suite 7, Level 2 154 Marsden St, Parramatta

Tel: (02) 9635 7764 Email: mail@westir.org.au

CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time. Any updated versions of this Privacy Policy will be posted on our website.