

PRIVACY NOTICE

Policy (Condensed) - Governance



PRIVACY NOTICE

(Condensed Privacy Policy)

Our privacy commitment

Venture Housing Company Limited (ABN 19154969963) (“we”, “us” and “our”) is a non-profit organisation and registered charity.

In carrying out our business, it may be necessary for us to collect your personal information. The type of personal information that may be collected will be determined by the nature of our business relationship with you.

We recognise that an individual's right to keep personal information private is highly important. We are committed to protecting and maintaining the privacy, accuracy and security of personal information in accordance with the privacy principles established under the Act, specifically the Australian Privacy Principles on and from 12 March 2014 (the **Privacy Principles**) as outlined in the **Privacy Amendment (Enhancing Privacy Protection) Act 2012**.

This Privacy Notice summarises how we handle your personal information. It summarises our policy for the collection, use, disclosure and storage of personal information that is covered under the Australian *Privacy Act 1988* (Cth), as amended from time to time (the **Act**) as well as the **Information Act 2002 (NT)** as amended from time to time. We may, from time to time, amend and update our Privacy Policy and this Privacy Notice. The revised Privacy Policy and Notice will take effect when the Privacy Notice is posted on our website.

General information about privacy and the operation of the Act can be found at the Office of the Australian Information Commissioner (**OAIC**) website at: www.oaic.gov.au/privacy/about-privacy.

What is personal information?

Personal information 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.

The types of personal information we collect may include your name, date of birth, gender, contact information, credit/debit card information, health information and other information about your history with, or relationship to the program or facility managed by us.

Whose personal information do we collect?

We collect personal information from people who are connected to our operations and activities as a non-profit organisation – including employees, job applicants, members, directors, donors, funding

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providers, tenants, research participants, recipients of support services, participants in advocacy campaigns or health promotion projects, health professionals, suppliers, volunteers and service providers.

Your responsibilities

By engaging with us (whether in person, by telephone or in writing, including by electronic means), you agree:

- to ensure that personal information provided to us is accurate, complete, up-to-date and not misleading and you acknowledge that we will rely on this information to conduct business with you;
- to notify us, in writing, of changes to personal information provided to us as soon as reasonably practicable; and
- to cooperate with us in addressing our respective privacy obligations, having regard to the nature of our business relationship with you.

You have the right to refuse to provide us with personal information.

Using a pseudonym or engaging with us anonymously and what happens if you do not provide all the personal information requested

If you have general enquiry type questions, you can choose to do this anonymously or use a pseudonym. We might not always be able to interact with you this way. In general, we will not be able to deal with you anonymously or where you are using a pseudonym when:

- it is impracticable; or
- we are required or authorized by law or a court/tribunal order to deal with you personally.

Therefore, if you do not provide some or all of the personal information requested, we may not be able to offer you services or provide you with information that may support your specific requirements or provide you with information about our causes, events, programs and projects

How do we collect your personal information?

We only collect personal information, by lawful and fair means, and only if such information is relevant to our business relationship, as a non-profit organisation, with you. Where possible, we will collect your personal information directly from you. This may be in person (for example, when you lodge an application for a tenancy or attend an event), on the telephone (for example, if you contact one of our property managers for assistance, or if you answer a telephone-based research questionnaire), or online (for example, if you sign up for an event online).

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We also obtain personal information from third parties such as referees, contractors (including fundraising service providers), health professionals, social and community workers. If we collect personal information about you from a third party and it is unclear that you have consented to the disclosure of your personal information to us, we will take reasonable steps to contact you and ensure that you are aware of the circumstances surrounding the collection and purposes for which we collected your personal information. If we determine that we could not have lawfully collected that information under the privacy law if we had requested it, we will destroy or de-identify the information, if it is lawful and reasonable to do so.

Why do we collect your personal information?

We may collect your personal information for a number of purposes, depending on our business relationship with you, including:

- Provision of services: to provide our services to you whether on a commercial basis (for example, when tenancing one of our properties or through our community service programs)
- Marketing: to communicate with you about donations, services, campaigns and events. You may opt out at any time if you do not wish to, or no longer wish to, receive marketing promotion information. (Please refer to 'opting out' below)
- Support services: to provide you with information and support services, and to evaluate and report on these services
- Impact evaluation, advocacy and research: to measure the impact of our services and/or provide advocacy and/or conduct and/or fund research
- Campaigns: to provide you with information about and to seek your support for campaigns
- Membership, volunteering and other support: to enable you to assist us with volunteering, community fundraising, advocacy and other activities where we seek the community's assistance
- Compliance: to comply with legislative and regulatory requirements otherwise necessary to fulfil our legal obligations and for internal purposes and for all other purposes related to and in connection with our business, including fulfilling our statutory obligations and contractual obligations to third parties, subject to your rights under our privacy policy
- Other: communicating with you in relation to our operations, activities and objectives, to verify your identity and to improve and evaluate our programs and services.

Where we collect your personal information for a specific purpose not outlined above, we will provide you with a collection notice which explains the primary purpose and any related secondary purposes for which we are collecting your personal information.

Health information and other sensitive information

As part of administering our services, we may collect/receive health information and other sensitive information. For example, we may collect medical history information from you, if you are participating in a program or research study where this is required to perform our services. Sensitive information includes the following type of information: racial or ethnic origin; political opinions; membership of a

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political association; religious beliefs or associations; philosophical beliefs; memberships; sexual orientation; genetic information; biometric information; biometric templates.

We only collect sensitive information (including health information) about you with your consent, except where we are required or permitted by law to collect your sensitive information without your consent.

We will only use your sensitive information where it is directly related to the provision of our services to you and such reasonable secondary purpose. Where possible, we will take such steps as are reasonable in the circumstances to ensure that the information is de-identified before we disclose it.

However, specifically, we may use information relating to:

- Your racial or ethnic origin, religious beliefs or affiliations and your dietary requirements for the primary purpose for which we have collected such information (and any reasonable secondary purpose);
- Your health, for medical emergency purposes or in circumstances where we have serious concerns for your health, safety or personal well-being; and
- Complying with legislative and regulatory requirements and otherwise fulfilling legal obligations.

Disclosure of government-related identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorized by law or unless you have voluntarily consented to disclose this information to any third party.

Website usage information, links and cookies

When you access our website, we may use software embedded in our website (such as Javascript) and we may place small data files (or cookies) on your computer or other device to collect information about which pages you view and how you reach them, what you do when you visit a page, the length of time you remain on the page, and how we perform in providing content to you. We may collect this information for statistical purposes to find out how the site is used and navigated, including the number of hits, the frequency and duration of visits and most popular session times. We may use this information to evaluate and improve our web site performance.

A cookie does not identify individuals personally, but it does identify computers. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

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Our websites may contain links to third-party websites that are not operated by us. We are not responsible for the privacy practices or policies of those sites and encourage you to review each website's privacy policy and/or terms of use, especially if you intend to disclose any personal information via that site.

A link to any third-party website is not an express or implied endorsement, promotion or warranty of the products or services offered by or accessible through that site or advertised on that site.

Opting out of direct marketing and promotional communications

Where we use your personal information to send you marketing and promotional information by post, email or telephone, we will provide you with an opportunity to opt-out of receiving such information. By electing not to opt-out, we will assume we have your implied consent to receive similar information and communications in the future. We will always ensure that our opt-out notices are clear, conspicuous and easy to take up.

If you do not wish to receive direct marketing communications from us, please contact us at Venture Housing Company, GPO Box 3204 Darwin NT 0801 (Level 2, 66 Smith Street, Darwin NT 0800); telephone: 08 8981 9804 or email the CEO: ceo@venturehousing.org.au

To whom does Venture Housing Company disclose your personal information?

We may need to disclose your personal information to others in order to carry out our activities. These may include:

- External support services: to health care professionals, lawyers, other professionals, counsellors, funders (including Federal, Territory and local government and philanthropists), financiers, coordinators, volunteers, service providers, agencies and not-for-profits that provide support services.
- Researchers to conduct research studies.
- Third parties for marketing purposes: we do not currently but we may provide your contact details to other like-minded organisations to contact you with information that may be of interest to you.
- Contractors and service providers who perform services on our behalf.

Wherever we propose to disclose your personal information to a third party not outlined above, we will provide you with a collection notice which explains the circumstances in which we might disclose your personal information.

Cross-border disclosures of your personal information

We use third party service providers, for example, internet-based Tenancy Management Services. Your personal information may be transferred to, and stored at, a destination outside Australia.

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We take such steps as are necessary in the circumstances to ensure that any overseas third-party service providers we engage do not breach the Australian Privacy Principles, including through contractual arrangements.

If your personal information is collected using a collection notice that references this Privacy Policy, you are taken to consent to the disclosure, transfer, storing or processing of their personal information outside of Australia. You also acknowledge and understand that by providing such consent that we will not be required to take such steps as are reasonable in the circumstances to ensure such third parties comply with the Australian Privacy Principles.

Where is your personal information stored?

Your personal information may be stored in paper-based form or electronically in our systems.

We take all reasonable steps to protect all of the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. Your personal information will be stored in limited-access folders on an electronic database, which may be on our server or other third party database storage or server provider. Health and sensitive information will be stored on databases that are password protected. Backups of electronic information are written to drives which are stored offsite.

Hard copy information is generally stored in our offices, in cabinets which are secured to prevent entry by unauthorised people. Any personal information not actively being used is archived, usually for 7 years, with a third party provider of secure archiving services.

Where personal information is stored with a third party, we have arrangements which require those third parties to maintain the security of the information. We take reasonable steps to protect the privacy and security of that information, but we are not liable for any unauthorised access or use of that information. We will notify you of any breach of security which may result in unauthorised access to your personal information.

Your personal information will stay on the database indefinitely until you advise you would like it removed, unless we de-identify it or destroy it earlier in accordance with privacy law requirements.

With your help, we will keep your personal information accurate, complete and up-to-date.

Your direct debit or credit cards

We only accept Electronic Funds Transfers (i.e. direct credits into Venture's bank accounts) for the payment of rents and bonds; and for the reimbursement of expenses due to tenant damage.

In the future, we may collect personal information when services or donations are purchased or made online via our website. In these cases, we would use third-party providers, such as PayPal, with Secure Socket Layer (SSL) certificates which is the industry standard for encrypting your credit card and debit card numbers, your name and address so that they cannot be viewed by any third party over the internet.

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Access to your personal information

We will, upon your request, and subject to applicable privacy laws, provide you with access to your personal information that is held by us. However, we request that you identify, as clearly as possible, the type(s) of information requested. We will deal with your request to provide access to your personal information within 30 days and you agree we may charge you our reasonable costs incurred in supplying you with access to this information.

Your rights to access personal information are not absolute and privacy laws dictate that we are not required to grant access in certain circumstances such as where:

- access would pose a serious threat to the life, safety or health of any individual or to public health or public safety
- access would have an unreasonable impact on the privacy of other individuals
- the request is frivolous or vexatious
- denying access is required or authorised by a law or a court or tribunal order
- access would be unlawful, or
- access may prejudice commercial negotiations, legal proceedings, enforcement activities or appropriate action being taken in respect of a suspected unlawful activity or serious misconduct.

If we refuse to grant you access to your personal information, we will provide you with reasons for that decision (unless it is unreasonable to do so) and the avenues available for you to complain about the refusal.

Accuracy and correcting or updating your personal information

If you believe that personal information we hold about you is incorrect, incomplete or not current, you can request that we correct or update your personal information by contacting us in writing. You may also request that we notify any relevant third parties of the correction and/or update.

You may ask us to update, correct or delete the personal information we hold about you at any time. We will take reasonable steps to verify your identity before granting access or making any corrections to or deletion of your information. We also have obligations to take reasonable steps to correct personal information we hold when we are satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading for the purpose for which it is held.

Mandatory Data Breach Law Compliance

Venture complies with the *Privacy Amendment (Notifiable Data Breaches) Bill 2017* which imposes an obligation on businesses subject to the Privacy Act to notify the Office of the Australian Information Commissioner (OAIC) where there is an **eligible data breach (ED)**. An ED Breach occurs (with limited exceptions) if:

- There is unauthorised access to, or disclosure of, **personal information**
- Information is lost with a risk of unauthorised access or disclosure; and

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- A reasonable person would conclude that the access or disclosure would be likely to result in serious harm to any of the individuals to who the information relates.

Examples of a data breach include when:

- A device containing a tenant's personal information is lost or stolen
- A database containing personal information is hacked
- Personal information is mistakenly provided to the wrong person

Venture has a **data breach response plan** which is a tool to assist it to manage a data breach. It is the framework which sets out the roles and responsibilities for managing an appropriate response to a data breach, as well as describing the steps that Venture will take in managing and containing an ED Breach if one occurs; as well as ensuring that such an ED Breach does not re-occur.

You will be immediately notified where Venture is certain that an ED Breach has occurred.

Where Venture suspects but is not certain that an ED Breach has occurred, it is permitted to carry out a reasonable and expeditious assessment (within 30 days of when suspicion was aroused) to determine if there are reasonable grounds to believe that an ED Breach has occurred.

If notification is required, Venture will prepare a statement setting out:

- Venture's contact details and the name and contact details of the appropriate contact person
- A description of the eligible data breach
- The kind or kinds of information concerned
- Any assistance that will be offered
- Recommendations about steps you should take in response to the eligible data breach
- Whether the Breach has been notified to other external contact/s
- Venture will also give a copy of the Notification to the OAIC
 - The Notification to the OAIC will not include your personal information
 - OAIC can be contacted as follows:
 - By telephone on 1300 363 992
 - By email: enquiries@oaic.gov.au
 - Website: www.oaic.gov.au
 - Post: GPO Box 5218 Sydney NSW 2001
- Venture will also provide a copy of the Notification to the Office of the Information Commissioner, Northern Territory which can be contacted as follows:
 - By telephone on: 1800 005 610 or (08) 8999 1500
 - By email: infocomm@nt.gov.au

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- Website: www.infocomm.nt.gov.au
 - Post: GPO Box 3750 Darwin NT 0801

Questions or Complaints

If you have any questions, concerns or complaints about or in connection with this notice and our privacy policy (including any concerns about how we handle your personal information), please contact us in writing to:

Chief Executive Officer
Venture Housing Company
GPO Box 3204
DARWIN NT 0801

Or email: ceo@venturehousing.org.au

We will respond to you as soon as possible. If you are not satisfied with our response, please let us know and we will investigate further and work with you to resolve the matter.

Where we are not able to resolve the complaint with you, you may also refer the complaint to the Office of the Australian Information Commissioner (please refer to www.oaic.gov.au)


This information was last updated on: 08 November 2017

Endorsement

Chair

Date:

Version 3.0

Next Review Date: 27 November 2020