

PRIVACY POLICY

Contents

1.	Policy Statement.....	3
2.	Collection of Personal Information	4
3.	Collection of Sensitive Information.....	4
4.	Consent	4
5.	Unsolicited Information.....	5
6.	Storage of Information.....	5
7.	Accuracy of Information	5
8.	Using or Disclosing Personal Information.....	5
9.	Using or Disclosing Personal Information for Direct Marketing	5
10.	Access to and Correction of Personal Information	6
11.	Cross-Border Disclosure.....	6
12.	Complaint and How to Contact HOST.....	6
13.	Acronyms, Abbreviations and Definitions	7
14.	Related Documents	8

Effective date

20/8/18

Prepared by

Corporate Governance on 20th August 2018

Authorisation

This Policy was authorised by Corporate Governance on 20th August 2018

Policy owner

Corporate Governance

HostPolicy@hostinternational.org.au

Version history

Version Number	Date Revised	Revision Description	Approval	Date Effective

1. Policy Statement

- 1.1 HOST International (HOST) will ensure this policy is available on the website and can be provided by other means, if required, to fulfil individual requests. HOST will endeavour to translate this policy into other languages, if required. Copies of this policy can be requested contacting HOST using the below details:

HOST International
 P.O. Box 2358
 North Parramatta NSW 1750
 Australia
 Email: privacy@hostinternational.org.au
 Phone: +61 (0)2 8660 1000

- 1.2 This policy provides with clear obligations regarding the collection, storing and disclosure of personal and sensitive information relating to individuals involved with HOST activities or functions.
- 1.3 HOST has an obligation to adhere to, and maintain knowledge of, federal and state legislation regarding privacy. HOST is obligated to adhere to the Privacy Act 1988 (Cth) including the Australian Privacy Principles (APP) detailed within the Act.
- 1.4 This policy applies to all HOST employees, volunteers, contractors, board members and other individuals engaged with HOST in providing services.
- 1.5 It is the responsibility of each person within the application scope to comply with this policy. Further to this, all line managers are responsible for assisting and supporting their staff to adhere to this policy.

2. Collection of Personal Information

- 2.1 HOST will only collect personal information pertinent to the functions or activities of the organisation.
- 2.2 Where personal information is required, and this information is reasonably necessary, it will be collected through lawful and fair means, involving no deception or illegal activity.
- 2.3 Personal information will only be collected from an individual to whom the information relates, unless this is unreasonable or not practically possible.
- 2.4 Individuals will be given the option to remain anonymous or using a pseudonym unless HOST is required by law to use the correct identity information.
- 2.5 When collecting personal information, HOST will inform the individual of the following:
 - a) that HOST is collecting the information and provide HOST contact details
 - b) the primary purpose for the collection of the personal information
 - c) how the personal information will be used in undertaking a function or activity of HOST
 - d) if personal information is collected through a third party, the individual is aware of how this information was collected
 - e) where the collection of personal information is required or authorised by law or a court/tribunal order, the fact that it is so required or authorised (including the name of the law or details about the court/tribunal order)
 - f) any consequences if the personal information is not provided
 - g) details of any other person or entity to which HOST may disclose the personal information
 - h) that HOST Privacy Policy contains information about how the person may access and correct the information held about them
 - i) that HOST Privacy Policy contains information about how someone can make a complaint about a breach of the applicable APP's
 - j) whether or not personal information will be transferred overseas, this includes information stored in the cloud

3. Collection of Sensitive Information

HOST will not collect sensitive information about an individual unless:

- 3.1 the individual consents to the information being collected and it is deemed necessary for the purposes of an activity or function of HOST; or
- 3.2 the information is required or authorised by or under an Australian law, or a court/tribunal order; or
- 3.3 it is unreasonable or impracticable to obtain the individual's consent to the collection, use or disclosure, and HOST reasonably believe that the collection, use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety, or;
- 3.4 HOST has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to the entity's functions or activities has been, is being or may be engaged in, and HOST reasonably believes that the collection, use or disclosure is necessary for HOST to take appropriate action in relation to the matter.

4. Consent

Consent, whether express or implied, must meet the following key elements:

- 4.1 the individual must be adequately informed before giving consent
- 4.2 the individual must give consent voluntarily, and the individual must have the capacity to understand and communicate their consent.
- 4.3 consent can take a variety of forms, but a signature is always best

5. Unsolicited Information

If information is received which was not directly collected by HOST, the following actions may occur

- 5.1 If the information may have been lawfully collected, HOST may keep the information in accordance with the Privacy Laws. This includes notifying the individual concerned where reasonable.
- 5.2 If the information is not reasonably necessary for HOST functions or activities, and there is no legal requirement to retain it, the information will be destroyed or de-identified.

6. Storage of Information

- 6.1 staff are required to keep relevant documents in locked drawers or cabinets
- 6.2 access restrictions are in place on relevant documents or systems, including electronic access restrictions
- 6.3 HOST enforces a 'clean desk' policy to minimise the risk of inadvertent disclosure of personal information
- 6.4 security measures are in place to protect the use of portable storage devices, including laptops, disks and USB keys, such as using encryption
- 6.5 audit trails are recorded regarding access to documents
- 6.6 where documents in the care, control or possession of HOST contain personal information, HOST will endeavour to keep secure those documents by all means reasonably available to HOST in the circumstances.
- 6.7 employees, volunteers and others are to return any information at the end of their employment or involvement with the organisation.

7. Accuracy of Information

HOST will take steps to ensure information collected, used or disclosed is accurate, up to date and complete.

When stored information is no longer required, HOST will take reasonable steps to destroy or de-identify the information, unless the information is contained in a Commonwealth record, or there is a legal requirement to retain the information.

8. Using or Disclosing Personal Information

HOST will only use or disclose personal information for a secondary purpose (a secondary purpose is any purpose other than the primary purpose for which you collected the information) if;

- 8.1 consent is provided by the individual specifically to its use for another purpose
- 8.2 the individual to whom the personal information relates would reasonably expect that HOST would use or disclose their information for such a purpose and the secondary purpose is related to the primary purpose, that is, it must be connected or associated with the primary purpose. If the information is sensitive information, the secondary purpose must be directly related to the primary purpose, that is, it must be closely associated with the primary purpose, or
- 8.3 an exception in Law which permits the use for secondary purpose

9. Using or Disclosing Personal Information for Direct Marketing

Sensitive information (including health information) can and will only be used or disclosed for direct marketing if the individual has consented to that use or disclosure.

Non-sensitive personal information will only be used or disclosed for direct marketing where:

- 9.1 HOST collected that information directly from the individual

- 9.2 the individual whose information is disclosed would reasonably expect HOST to use the information for direct marketing

HOST may also use or disclose non-sensitive personal information for the purpose of direct marketing in circumstances where the individual to whom the non-sensitive personal information relates has consented, or it is unreasonable to obtain their consent.

HOST has a simple means by which an individual can opt out of the direct marketing and HOST makes the individual aware of the simple means to opt out of the direct marketing.

10. Access to and Correction of Personal Information

- 10.1 When receiving a request from an individual to provide the information collected by HOST, HOST will provide the information within a reasonable timeframe.
- 10.2 HOST may refuse a request for access in limited circumstances (for example where providing access would result in a serious threat to the safety of an individual or where the access would be unlawful).
- 10.3 In this instance HOST will provide the individual with written advice setting out the reasons for the refusal and the process for making a complaint where required.
- 10.4 Where an individual advises HOST that information held regarding them is inaccurate, out of date, irrelevant or incomplete HOST will endeavour to:
- take reasonable steps to correct the information and notify third parties to which it has provided the information
 - if there is disagreement about the accuracy, HOST will provide the individual with written notice of why HOST has refused to correct the information and how to make a complaint where required.

11. Cross-Border Disclosure

Due to the nature of the work that HOST performs, from time to time HOST will need and/or be required to provide personal information about an individual to an overseas recipient.

Countries in which overseas recipients may be located include Nauru, Malaysia, New Zealand.

Under Federal Privacy Laws, before HOST discloses personal information to an overseas recipient, it will take reasonable steps to ensure the overseas recipient does not breach the APPs.

12. Complaint and How to Contact HOST

If you have any concerns or questions regarding this policy or wish to make a complaint regarding HOST obligations to your privacy, the Privacy Officer contact details are below.

HOST International
P.O. Box 2358
North Parramatta NSW 1750
Australia
Email: privacy@hostinternational.org.au
Phone: +61 (0)2 8660 1000

13. Acronyms, Abbreviations and Definitions

ACRONYMS/ABBREVIATIONS	DEFINITIONS
HOST	HOST International
Cth	Commonwealth
APP	Australian Privacy Principles
Personal information	<p>Information or an opinion about an identified individual, or an individual who is ‘reasonably identifiable’.</p> <p>Personal information can be:</p> <ul style="list-style-type: none"> • true or false • verbal, written, or photographic, and • recorded or unrecorded. <p>Personal information includes a person’s name, address, contact details (such as telephone number or email), date of birth, gender, sexuality and race.</p>
Sensitive information	<p>A special category of personal information and is subject to stricter legal requirements for collection, storage use and disclosure.</p> <p>Under the Privacy Laws, information will be considered ‘sensitive information’ where it is information or an opinion about a person’s:</p> <ul style="list-style-type: none"> • 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 record. <p>Different requirements and thresholds apply to this kind of information under the Privacy Laws.</p>
Health information	<p>A type of personal information that includes information or opinion about a person’s:</p> <ul style="list-style-type: none"> • physical and mental health • disability and/or illness (at any time) • health preferences (including future provision of health services) • use of health services • bodily donations (eg. blood, organs), and • genetics. <p>Information that is considered ‘health information’ as this type of information is generally afforded a higher level of protection under Privacy Laws.</p>

14. Related Documents

DOCUMENT NAME	DOCUMENT NUMBER / LINK
Australian Privacy Principles	https://www.oaic.gov.au/privacy-law/privacy-act/australian-privacy-principles
Privacy Act 1988 (Cth)	http://www6.austlii.edu.au/cgi-bin/viewdb/au/legis/cth/consol_act/pa1988108/