



<h2>Privacy Policy</h2>		Tier: 2	
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1 Aim

Loreto Community Housing Limited (**we, our or us**) is committed to complying with its obligations under the *Privacy Act 1988 (Cth) (Privacy Act)*, including the Australian Privacy Principles (**APPs**) and the *Personal Information Protection Act 2004 (Tas) (PIP Act)*.

We are committed to respecting your privacy and protecting your personal information. Our staff are trained to protect your personal information in accordance with our policies, procedures and systems.

2 Policy

This policy outlines how we manage and secure your personal information. It also describes the kinds of personal information that we hold and for what purposes, and how that information is collected, held, used and disclosed.

This policy is easy to access and is available on our website at centacareevolve.com.au. You may request a copy of the policy by contacting the Privacy Officer in accordance with paragraph 15.1 of this policy.

Please read this policy carefully before you provide us with any personal information.

We will review this policy from time to time. We encourage you to check our website regularly as any updated policy will be available on our website.

3 Types of information that we collect and hold

3.1 General information

We may collect and hold the following types of personal information about you:

- (a) identification information, including your name, postal address, email address, date of birth;
- (b) your preferred language and/or whether you require a language interpreter;
- (c) your employment details;
- (d) Medicare number, driver's license, Centrelink number, passport and contact details;
- (e) bank account details;
- (f) financial transactions relating to your Loreto Community Housing accounts;
- (g) balances of accounts held at Loreto Community Housing;
- (h) tax file number;
- (i) marital status; and
- (j) any other information that we consider to be reasonably necessary.

3.2 Sensitive information

We may need to collect sensitive information about you. Unless the collection of the sensitive information is permitted under the Privacy Act, we will only collect sensitive information with your consent where that information is reasonably necessary for our functions.

We may collect and hold the following types of sensitive information about you:

- (a) information about whether you identify as Aboriginal or Torres Strait Islander;
- (b) gender identity relating to your preferred pronoun;
- (c) whether you are a participant of the National Disability Insurance Scheme;
- (d) any mobility requirements and necessary supports;
- (e) criminal records (where restriction on location is linked to criminal history); and
- (f) health information.

3.3 Information required by law

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

3.4 Social media

We may collect information about you when you interact with us through social media channels.

We will not interact with you about confidential matters via social media.

4 Collecting your information

4.1 Collecting personal information

We collect your personal information so that we can perform our functions and activities.

We will, if it is reasonable and practical to do so, collect personal information directly from you.

We may collect your personal information when:

- (a) you give us information over the telephone;
- (b) you interact with us electronically or in person;
- (c) you interact with us on our website; or
- (d) you complete application forms.

4.2 Collecting personal information from other sources

Sometimes we collect personal information about you from other sources where it is necessary to do so. This may happen where:

- (a) you have consented to the collection of the information from someone else;
- (b) we are required or authorised by law to collect the information from someone else; or
- (c) it is unreasonable or impracticable to collect the information from you personally.

Examples of other sources that we may collect personal information from include, but are not limited to:

- (a) schools;
- (b) your relatives;
- (c) our service providers;
- (d) from our business partners and other agencies within the Roman Catholic Church Trust Corporation (such as CatholicCare Tasmania)
- (e) Housing Connect (Homes Tasmania);
- (f) your authorised representative;
- (g) Services Australia (Centrelink);
- (h) debt collection agencies; and
- (i) information that is publicly available on the electoral roll.

4.3 What happens if you do not provide us with your personal information?

If you do not provide us with your personal information, we may not be able to:

- (a) verify your identity; and
- (b) provide you with the product or service that you want.

4.4 Unsolicited personal information

If we collect personal information about you that we did not ask for, we will check whether we could have collected that information ourselves. If we could have collected the information, we will handle it in the same way we handle other information we collect from you. If:

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

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

4.5 Notification of collection of personal information

When we receive personal information directly from you, we will take reasonable steps to notify you of the collection and the circumstances that surround the collection.

Sometimes:

- (a) we collect your personal information from third parties; or
- (b) you may not be aware that we have collected your personal information.

If we collect information that can be used to identify you, we will take reasonable steps to notify you of the collection and the circumstances that surround the collection.

5 Protecting personal information

5.1 Storing personal information

We are committed to keeping your personal information secure.

We store your personal information in different ways, including hard-copy paper files and electronically in our computer management system.

We treat all personal information as confidential. We will take reasonable steps to ensure personal information is protected from:

- (a) misuse, interference and loss; and
- (b) unauthorised access, modification and disclosure.

5.2 How we protect your information

Some of the ways we protect your information 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.

5.3 What happens if we no longer need your personal information?

If we no longer need your personal information for any purpose, we will take reasonable steps to destroy or permanently de-identify the information, unless:

- (a) the information is contained in a Commonwealth record; or
- (b) we are required by law, or a court/tribunal order, to retain the information.

6 Purposes for collecting, holding, using and disclosing information

We collect, hold, use and disclose your personal information for the purpose it was collected and related purposes, including:

- (a) to assess your housing eligibility;
- (b) to establish and administer your tenancy and rental payments;
- (c) to verify your identity;
- (d) to consider any other application made by you for products or services;
- (e) for customer relations purposes, including managing our relationship with you;
- (f) to comply with any payment systems requirements;
- (g) for information technology systems development and testing where our internal computer systems are upgraded;
- (h) for internal operations, including record keeping, risk management, auditing, training, file reviews and account analysis;
- (i) to investigate, resolve and prevent complaints;

- (j) to conduct fraud assessments;
- (k) for reporting and data analytics purposes, including for regulatory, management, statistical or research purposes;
- (l) to comply with any applicable laws, regulations or codes of practice;
- (m) for communications such as newsletters; and
- (n) for any other purpose for which you have given your consent.

7 Use and disclosure of information

7.1 Use and disclosure of personal information

We will not use or disclose personal information we hold about you that was collected for a particular purpose for another purpose, unless:

- (a) you have consented to the use or disclosure of the information for another purpose; or
- (b) the use or disclosure is otherwise permitted under the Privacy Act and the PIP Act (e.g. you would reasonably expect us 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).

7.2 Disclosure to third parties

Sometimes we may disclose personal information about you to third parties. Examples of third parties that we may disclose your personal information to include, but are not limited to:

- (a) our service providers;
- (b) our agents, contractors and external advisors (for example, lawyers, auditors and Catholic Development Fund Tasmania);
- (c) any person acting on your behalf, including your legal and financial advisers;
- (d) Government (including Centrelink), and other regulatory bodies, law enforcement bodies and courts as required or authorised by law;
- (e) Local government (for example, to provide contact details to council officers for the purpose of issuing council notices);
- (f) external dispute resolution bodies, including members of parliament or their staff, ombudsman: as requested by them, or in response to investigations or complaints;
- (g) maintenance and other service contractors, including property valuers;
- (h) emergency services (Tasmanian Fire Service, Police, Ambulance, SES) as required;
- (i) other financial institutions; and
- (j) any other person where you have given your consent.

7.3 Overseas recipients

In some circumstances we may need to disclose your personal information to overseas recipients for the purpose of storing your personal information via a Cloud service. These recipients are likely to be located in the United States of America.

As data storage can be accessed from various countries via an internet connection, it is not always practicable for us to know what country your personal information may be held in. As such, disclosures may sometimes occur in countries other than the country listed above.

7.4 Disclosure

Where your personal information is disclosed, we will:

- (a) take reasonable steps to ensure that the overseas recipient does not breach the APPs, unless an exception in the Privacy Act applies; and
- (b) seek to ensure that information is used, held and disclosed consistently with the Privacy Act and the PIP Act and any other applicable laws.

8 Direct marketing

8.1 Direct marketing

We may use or disclose your personal information (excluding sensitive information) for direct marketing purposes.

8.2 Sensitive information

We will only use or disclose your sensitive information for the purposes of direct marketing if you have consented to the information being used or disclosed for the purposes of direct marketing.

8.3 Contracted service providers

We may also use or disclose personal information for the purpose of direct marketing if:

- (a) we are a contracted service provider for a Commonwealth contract; and
- (b) we collected the information for the purpose of meeting (directly or indirectly) an obligation under the Commonwealth contract; and
- (c) the use or disclosure is necessary to meet (directly or indirectly) such an obligation.

8.4 Method of direct marketing

We may conduct direct marketing via:

- (a) email;
- (b) telephone;
- (c) mail; and
- (d) any other electronic means.

8.5 Opt-out

If at any time you decide you:

- (a) do not want to receive any more direct marketing material from us;
- (b) do not want us to use or disclose the information for direct marketing in the future; and/or
- (c) want to know where we obtained the information,

you may:

- (d) contact the Privacy Officer in accordance with paragraph 15.1 of this policy; or
- (e) opt-out of receiving any more marketing material via any opt-out mechanism contained in our marketing correspondence.

All our marketing correspondence will display a clearly visible and user-friendly opt-out mechanism. We may imply consent to receive direct marketing material if you do not use the opt-out mechanism.

8.6 Processing requests

If you request to no longer receive direct marketing material we will process your request within a reasonable period after the request is made.

9 Quality of personal information

We will take reasonable steps to ensure that any personal information we collect, use or disclose is accurate, complete, up-to-date and relevant to our functions or activities.

If you believe that your personal information is not accurate, complete or up to date, please contact the Privacy Officer in accordance with paragraph 15.1 of this policy.

10 Access to personal information

10.1 Requesting access

You may at any time request access to personal information we hold about you. We will give you access to that information, unless an exception in the Privacy Act and the PIP Act applies.

You can request access to your personal information by contacting our Privacy Officer in accordance with

paragraph 15.1 of this policy.

10.2 Dealing with access requests

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

We may need to verify your identity before we give you access to your personal information.

10.3 Access fees

Depending on the nature of the request, we may charge you a small fee to access that information.

10.4 Refusal to give access

If we refuse to give you access, we will:

- (a) take reasonable steps to give you access in a manner that meets our needs as well as yours;
- (b) provide you with the reasons for our decisions as required by the Privacy Act; and
- (c) provide you with the options available to make a complaint about the refusal.

11 Correcting personal information

11.1 Requesting correction

If you think that any personal information we hold about you is incorrect, inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request us to correct the information by contacting the Privacy Officer in accordance with paragraph 15.1 of this policy.

11.2 Correcting information

We will take reasonable steps to correct that information.

11.3 Dealing with correction requests

We will respond to a correction request within a reasonable time (usually 30 days).

We may need to verify your identity before we correct your personal information.

11.4 Notification of correction to third parties

If we correct your personal information that we have previously disclosed to another entity, and you ask us to tell the other entity about the correction, we will take reasonable steps to tell the other entity about the correction, unless it is impractical or unlawful to do so.

11.5 Refusal to correct information

If we refuse to correct the personal information, then we will provide you with the reasons for our decision as required by the Privacy Act.

12 Anonymity

You have the option to remain anonymous, or to use a pseudonym when dealing with us where it is lawful and practical to do so.

13 Government related identifiers

In certain circumstances we may be required to collect government-related identifiers such as your tax file number, Medicare number, Centrelink reference number, drivers licence number, passport number and individual healthcare identifiers.

We will not use or disclose this information unless the use or disclosure is permitted under the Privacy Act.

14 Data Breach

We are committed to complying with our data breach reporting obligations.

We 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 our obligations under the Privacy Act.

15 Complaints about personal information

15.1 Complaints

If you:

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

please contact our Privacy Officer.

Complaints can be made in writing or orally to:

Privacy Officer

Telephone: 03 6208 6296

Mail: 2/28 Green Point Road, Bridgewater, TAS, 7030

Email: LCH-privacyofficer@aohtas.org.au

15.2 External complaint mechanism

If you are not happy with the outcome of the Privacy Officer's investigation or we have not replied to you within a reasonable time, then you can raise your concern with the Office of the Australian Information Commissioner (**OAIC**).

Complaints can be made to OAIC in the following ways:

Office of the Australian Information Commissioner

Telephone: 1300 363 992

Email: enquiries@oaic.com.au

Mail: Office of the Australian Information Commissioner

GPO Box 5218 Sydney NSW 2001

Online: www.oaic.gov.au/privacy/making-a-privacy-complaint

16 Related Documents

- (a) Privacy Statement;
- (b) Complaints & Appeals Policy; and
- (c) Complaints and Appeals Procedure.