
Women's Property Initiatives

Policy Manual 3.0

Office

Privacy Policy

1. Policy Objectives

To ensure that WPI collects, uses, discloses and otherwise handles personal information in compliance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and other applicable privacy legislation.

A copy of this Privacy Policy is available on WPI's website at www.wpi.org.au/. A printed copy can be obtained by contacting WPI (details under heading 13).

2. Application of Policy

All WPI staff members, volunteers, directors, tenants, donors and contractors.

3. Personal information

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

4. Sensitive information

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection. Sensitive information includes health and genetic information and information about racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record and some types of biometric information.

5. Applicable legislation

WPI is bound to comply with the Australian Privacy Principles (**APPs**) in the Privacy Act. The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection to use and disclosure, storage, accessibility and disposal.

WPI is also required to comply with the Health Privacy Principles in the *Health Records Act 2001* (Vic) (**Health Privacy Law**) when WPI collects and handles health information.

In certain circumstances (for example, where funding agreements with government agencies require it), WPI may also be required to comply with the Information Privacy Principles in the *Privacy and Data Protection Act 2014* (Vic).

6. Employee Records

WPI is generally exempt from the Privacy Act when it collects and handles employee records and this policy does not apply to that information. However, the Privacy Act still applies to personal information about job applicants, contractors and volunteers, and the Health

Privacy Law still requires WPI to protect the privacy of employee health information. This policy will apply in those circumstances.

7. Collection

7.1 Collection of personal information

WPI will not collect personal information (other than sensitive information) unless the information is reasonably necessary for its functions or activities.

For example, if you:

- **apply for housing and other property related services and activities or become a tenant of WPI**, WPI may collect your name, address, age, occupation, bank account and other financial details;
- **contact WPI with a request or enquiry related to WPI's services**, WPI may collect your name, address, contact details and the details of your enquiry;
- **register for a subscription to a WPI publication**, WPI may collect your name, organisation and contact details and details about the information you access in our publications;
- **make a donation to WPI**, WPI may collect your name, organisation, contact details, the amount and frequency of your donation and payment details;
- **attend a WPI event**, WPI may collect your name, organisation, contact details, payment details (if applicable) and any dietary and accessibility requirements;
- **participate in WPI's surveys**, WPI may collect your name, organisation contact details and your survey responses;
- **make a complaint**, WPI may collect your name, contact details, the details of your complaint, information collected in any investigation of the matter and details of the resolution of the complaint;
- **apply for a role at WPI**, WPI may collect the information you include in your application, including your cover letter, resume, contact details and referee reports.

7.2 Collection of sensitive information

WPI will not collect sensitive information about you unless the information is reasonably necessary for one or more of its functions or activities and either:

- the individual has consented; or
- WPI is required or authorised by or under law (including applicable privacy legislation) to do so.

For example, WPI may collect information about any physical disability you (or your family members) may have where relevant in assessing your housing needs.

7.3 Methods of collection

WPI will collect personal information by lawful and fair means as required by the Privacy Act. Where it is reasonable and practicable WPI will collect personal information directly from you.

WPI collects personal information in a number of ways, including:

- in person;
- over the telephone;
- through written correspondence (such as letters, faxes and emails);
- on hard and soft copy forms; and
- from third parties, including support agencies, health services providers or an individual's authorised representative;
- through WPI's website when an individual makes a donation;
- at WPI events;
- from Centrelink

7.4 Why does WPI collect personal information

The main purposes for which WPI collects, holds, uses and discloses personal information are to:

- provide information and services;
- promote itself and its products and services, including through direct marketing, events, competitions and social media;
- procure products and services for itself and tenants;
- perform research and statistical analysis, including for marketing, customer satisfaction, product development and service improvement purposes relevant to WPI's activities;
- answer queries and resolve complaints;
- recruit staff, volunteers and contractors;
- seeking funding and donations;
- assess whether applicants meet WPI's service and/or housing criteria.

WPI may also collect, hold, use and disclose personal information for other purposes explained at the time of collection, or which are required or authorised by or under law, or for which consent has been provided.

8. Direct marketing and opting out



WPI may use your personal information to let you know about it and its services (including promotions and events) either where consent (express or implied) has been provided or where WPI is otherwise permitted by law to do so.

Where you have consented to receiving marketing communications from WPI, that consent will remain current until you advise WPI otherwise. However, you can opt out at any time, as explained below.

Opting out

You can opt out of receiving marketing communication from WPI by:

- advising WPI if you receive a marketing call that you no longer wish to receive these calls;
- using the unsubscribe facility that WPI includes in its commercial electronic messages (such as emails and SMS's) to opt out of receiving those messages; or
- contacting WPI by email at admin@wpi.org.au, by phone on 9664 7800, by facsimile 9663 6324, or by sending a letter to Level 4/189 Flinders Lane, Melbourne, 3000.

9. Trans-border Data Flows

WPI does not currently disclose personal information to third parties located overseas. If this changes at some time in the future, WPI will comply with the requirements of the Privacy Act that apply to cross border disclosures of personal information and this Privacy Policy will be amended accordingly.

10. Data quality and security

WPI holds personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists and in paper files held in drawers and cabinets. Paper files may also be archived in boxes and stored offsite in secure facilities onsite in the office archives. WPI will take reasonable steps to:

- make sure that any personal information it collects, uses or discloses is accurate, complete, up-to-date and (in the case of use and disclosure) relevant;
- protect the personal information that WPI holds from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- destroy or permanently de-identify personal information that:
 - (a) is no longer needed for any purpose that is permitted by the APPs; and
 - (b) WPI is not required to retain by or under an Australian law, or a court or tribunal order.

11. Access and Correction

You may contact WPI (details under heading 13 below) if you would like to access or correct any of the personal information that WPI holds about you. WPI may require you to verify your identity before processing the request to make sure that the personal information that it holds is properly protected.

11.1 Access

Where WPI holds personal information about you, WPI will generally provide you access to that information on request by you or your authorised representative, subject to some exceptions permitted by law. WPI will also generally provide access in the manner that is requested (eg by providing photocopies or allowing a file to be viewed), provided that it is reasonable and practicable for it to do so. WPI may charge a fee to cover its reasonable costs of locating and providing the information.

11.2 Correction

If you ask WPI to correct personal information held by it, or if WPI is satisfied that the personal information it holds is inaccurate, out of date, incomplete, irrelevant or misleading, WPI will take reasonable steps to correct that information to ensure that, having regard to the purpose of which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If WPI corrects personal information about you, and WPI has previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask WPI to notify that other entity. If so, WPI will take reasonable steps to do so, unless this would be impracticable or unlawful.

If WPI does not agree to your access or correction request, or if WPI does not agree to give you access in the manner you requested, WPI will provide you with a written notice setting out:

- the reasons for the decision (except to the extent that, having regard to the grounds for refusal, it would be unreasonable to do so); and
- available complaint mechanisms.

In addition, if WPI refuses to correct personal information in the manner you have requested, you may ask WPI to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, and WPI will take reasonable steps to do this to associate the statement in such a way that will make it apparent to users of the information.

11.3 Timeframe for access and correction requests

Except in the case of more complicated requests, WPI will endeavour to respond to access and correction requests within 30 days.

11.4 Anonymity

The nature of the business carried on by WPI means that, generally, it is not possible for WPI to provide services to its tenants or otherwise deal with individuals in an anonymous way.

Wherever it is lawful and practicable, however, WPI will provide you with the option of not identifying yourself, or of using a pseudonym (for example, when viewing WPI's website or making general phone queries). Donations may also be made anonymously, but in this case WPI may not be able to issue a tax deductible receipt.

12. Complaints



If you have a complaint about how WPI has collected or handled your personal information, please contact WPI (details under heading 13).

12.1 Complaints process

WPI is committed to the above privacy principles and will endeavour to deal with complaints in a fair, respectful and timely manner. This may include, for example:

- gathering the relevant facts;
- locating and reviewing relevant documents; and
- speaking to relevant individuals.

In most cases, WPI expects that complaints will be investigated and a response provided within 30 days of receipt of a complaint. If the matter is more complex and WPI's investigation may take longer, WPI will write and let you know, and tell you when it expects to provide its response.

If you are unhappy with WPI's response, you can refer your complaint to the Office of the Australian Information Commissioner (see [here](#) for further information) or, in some instances, other regulatory bodies, such as the Commissioner for Privacy and Data Protection (see [here](#)) or the Health Services Commissioner (see [here](#)).

13. Contact details

Please contact WPI if you have any queries about the personal information that WPI holds about you or the way WPI handles that information. WPI's contact details for privacy queries are set out below.

Women's Property Initiative

Mail: Level 4/189 Flinders Lane, Melbourne, Victoria 3000

Email: admin@wpi.org.au

Telephone: 9664 7800

Facsimile: 9663 6324

14. Changes to this Policy

WPI may amend this Privacy Policy from time to time. The current version will be posted on WPI's website and a copy may be obtained from WPI.

Updated 15 September 2016.