

# Privacy Statement

Document Owner

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## OUR COMMITMENT TO PRIVACY

Protecting your privacy is important to the Housing Choices Australia Group (**HCA Group**).

The HCA Group is committed to managing the handling of personal information it collects in the provision of housing services in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth) and other applicable privacy and related laws.

You can expect that personal information collected by all HCA Group entities will be handled in a manner that is consistent with our policies and in accordance with applicable laws.

This statement provides an overview of how the HCA Group (and each entity within the group) is meeting these obligations.

## WHAT INFORMATION DO WE COLLECT ABOUT YOU?

The HCA Group collects a range of personal information (including sensitive and health information), to enable the efficient and high standard delivery of HCA housing services. However, we will endeavour to only collect information from you that is reasonably necessary based on the services that we deliver.

The types of personal information we collect may include (but are not limited to):

- information to identify you;
- contact details;
- information about your personal, family and household circumstances;
- information about your health, including disability information;
- information about your place of work;
- if relevant, your ethnic origin;
- your preferred language;
- your personal income;
- details of your rental history; and
- if directly related to our services or relevant, images and audio or visual recordings.

In most cases, this information is collected directly from you, either verbally or in writing. In some cases it may be collected from other parties, as set out in our Collection Statement. Where the collection occurs in circumstances that are not described in the Collection Statement we may notify you, when it is reasonable to do so.

It is important to us that the information we have about you is up to date. We will take reasonable steps to make sure that it is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable and we will consider if the information requires amendment. If we agree to correct the information then, where reasonably practicable, we will notify you of the updates that we have made to our records.

# WHAT DO WE USE YOUR PERSONAL INFORMATION FOR AND WHY MAY WE DISCLOSE IT?

The HCA Group may collect, use or disclose your personal information for purposes which include:

## GENERALLY

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- assessing use of our website;
- to contact you in relation to any enquiries made by you;
- internal evaluation and planning purposes (for example, in supervising staff or ensuring quality service delivery);
- research and statistical analysis (aggregated and de-identified information only), to evaluate and improve the housing and related services offered;
- marketing the services offered by the HCA Group;

## FOR RESIDENTS AND PROSPECTIVE RESIDENTS

- providing information to other HCA Group entities, our partners (including government and other service providers) and contractors while providing you with housing services or addressing issues arising from your use of housing services;
- assessing your eligibility to access housing services;
- assessing rent payable;
- assessing any special accommodation needs;
- tailoring the housing services we provide to your personal circumstances;
- monitoring and managing issues which arise regarding housing services provided to you;
- facilitating work performed by contractors and service providers;
- assisting law enforcement and regulatory bodies as permitted by law;
- to assist any persons who have legal powers to act for you, such as powers of attorney, in accordance with those rights; and

## FOR EMPLOYEES, POTENTIAL EMPLOYEES AND VOLUNTEERS

- for recruitment and personnel management purposes (as authorised by law).

# HOW DO WE STORE YOUR PERSONAL INFORMATION AND KEEP IT SECURE?

The HCA Group will store your information securely, whether it is held in electronic or paper form. Hard copy records are held securely on or off site and electronic records are held in databases (which may be government controlled or held by third party providers) that are secured in accordance with recommended industry standards. We do use cloud-based data storage services such as Microsoft 365. We will endeavour to ensure that that these services and platforms will store information in Australia, but storage may occur overseas.

The steps that we take to ensure the information we hold is secure include:

- website protection measures (such as encryption, firewalls, anti-virus software);
- access restrictions to our computer systems (such as login and password protection);
- restricted access to our office premises; and
- staff training and implementation of workplace policies and procedures that cover access, storage and security of information.

To ensure that our practices are current, we regularly review and update our electronic data security measures.

We will only keep your information for as long as we consider that it is needed for any purpose for which it was collected, or otherwise if it is part of a Commonwealth or State record or is required to be retained under Australian law or our contractual obligations. Once your information is no longer required to be stored, we will archive and securely destroy or de-identify that information, in accordance with relevant obligations.

You are able to access your personal information held by the HCA Group at any time, on request (except in specific circumstances, permitted by law). If you wish to access your personal information, please contact the HCA Group using the below contact information.

## USE OF COOKIES

When you use our website, we may track your usage patterns using cookies (data that a website transfers to an individual's hard drive for record-keeping purposes). Cookies also allow you to use features such as online transactions and services. The HCA Group website uses cookies for online transactions and services only, and we do not store personal information about our visitors.

Note: If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. Be mindful that if you disable the cookie feature you may not be able to use our online transactions and services.

## MANDATORY NOTIFIABLE DATA BREACHES

The HCA Group will comply with the notification and other requirements of the Privacy Act 1988 (Cth), for example where personal information has been inadvertently lost or disclosed or improperly accessed and that loss, disclosure or access may result in serious harm to you.

## ANY QUESTIONS?

If you have any questions or concerns about this Privacy Statement or the way in which your personal information has been handled, please contact the HCA Group:

Contact	Privacy Officer
Address	Level 3, 350 Queen Street Melbourne Victoria 3000
Email	<a href="mailto:privacy@hcau.org.au">privacy@hcau.org.au</a>
Phone	1300 312 447

## OTHER RESOURCES

For more information regarding how the HCA Group handles your personal information and other privacy related matters, please refer to the following HCA Group resources:

- Collection Statement
- Privacy Guide for residents [to be finalised]
- FOI Request Procedure [to be drafted]
- Document Retention and Destruction Procedure for Personal Information [to be drafted]
- Marketing and Image Use Procedure [to be drafted]

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For a summary of what the Australian Privacy Principles require, please refer to the APP Guidelines prepared by the Office of the Australian Information Commissioner.

NOTE: The HCA Group means each of the following, unless the members of Housing Choices Australia Limited (HCAL) resolve by special resolution that an entity has been removed or released from, or has otherwise exited, the HCA Group:

- Housing Choices Australia Limited (ACN 085 751 346) (**HCAL**);
- Housing Choices Tasmania Limited (ACN 147 840 202) (**HCTL**);
- Housing Choices South Australia Limited (ACN 122 807 130) (**HCSAL**);
- Housing Choices NSW Limited (ACN 619 158 299) (**HCNSWL**);
- Urban Choices Property Limited (ACN 639 237) (**UCP**);
- Disability Housing Limited (ACN 118 571 547) (**DHL**); and
- Singleton Equity Housing Limited (ACN 007 008 853) (**SEHL**).

and any of their subsidiaries and any other entity which the members of HCAL resolve by special resolution forms part of the HCA Group from time to time, in each case including any such entity's role as trustee of a trust.

## References

### **Standards and Legislation:**

Privacy Amendment (Notifiable Data Breaches) Act 2017

Health Records & Information Privacy Act 2002 NSW

Charter of Human Rights and Responsibilities Act 2006

Information Privacy Act 2000

Listening Devices Act 1991 TAS

My Health Records Act 2012 (Cth)

NCHS Section 3: Tenant Rights and Participation

Privacy & Data Protection 2014 (Vic)

Section 13: Right to privacy and reputation

Privacy Act 1988

State Records Act 1997 SA

Surveillance Devices Act 2007 NSW

Surveillance Devices Act 2016 SA

Surveillance Devices Act VIC 1999

### **Related Processes**

Privacy Policy

Collection of Personal Information Procedure

Consent & Privacy Agreement