

# PRIVACY POLICY

---

## 1.0 Purpose

CA, Employees may be exposed to confidential information about customers, other Employees and/or CA business information and activities. Employees are expected to respect confidentiality always.

CA observes the Australian Privacy Principles (APP), which came into effect on 12 March 2014. The APPs replace the National Privacy Principles and Information Privacy Principles formerly contained in the *Privacy Act 1988*.

This Privacy Policy explains how CA manages personal information, pursuant to the APPs, including;

- How CA collects, protect, holds and discloses (in certain circumstances) personal information?
- The purpose for which CA holds personal information
- How Employees and customers may access personal information and seek correction of such information, if necessary?
- Whether CA are likely to disclose personal information to overseas recipients
- How Employees and customers may complain about a breach of the APPs or a registered APP code (if any) and how we will deal with such a complaint.

### *Definition of Confidential Information*

"Confidential Information" is defined as proprietary (owning or holding exclusive rights to something) or non-public oral and written information or machine-readable information belonging to CA accessible to Employees through the course of their employment with CA. Examples include: customer records, financial statements and business records, human resources/payroll records, legal documents and/or sales and marketing material.

---

## 1.2 Policy

*Special Note: Throughout this Privacy Policy, any reference to "customers" will be taken to include all persons associated with CA business activities, including; staff, volunteers, patrons, contractors and suppliers.*

### 1.2.1 How CA Collect Personal Information?

CA will generally collect personal information directly from Employee and Customers when they use our website, provide details in an enrolment & registration forms, communicate; over the telephone, by letter, via e-mail or in the course of CA providing services to them.

### 1.2.2 Personal Information of Minors

- CA will not collect personal information from minors directly. CA will only collect personal information regarding minors via their parents or other persons with either parental responsibility or legal guardianship over such minors.
- For the purposes of this Privacy Policy, CA will only collect personal information of a minor with the express consent of Authorised Persons. *Throughout the remainder of this Privacy Policy, any reference to "customers" (where it pertains to a minor) will be taken to include an Authorised Person, where the context requires.*
- CA reserves the right to require a purported Authorised Person to provide written proof of identity and their relationship with any relevant minor prior to collecting, using, disclosing or otherwise allowing that Authorised Person to access Personal Information we may hold about that minor.

### 1.2.3 Information CA holds

Normally, the type of personal information CA collects will include, but not be limited to:

- Names
- Addresses / Email addresses
- Telephone numbers
- Bank details
- Date of Birth

### 1.2.4 Anonymity and Pseudonymity

Under the APPs, Customers do have the option of not identifying, or using a pseudonym, when dealing with CA in relation to a particular privacy matter.

However, this option may be available to Customers if, in relation to a privacy matter:

- CA is authorised under an Australian Law, or court / tribunal order, to deal with individuals who have not identified themselves
- CA indicates that identification is not required (or compulsory), as per use on a Feedback Form or processes to gather general Community information

#### *1.2.5 The purposes for which CA holds Personal Information*

CA collects personal information for some or all of the following purposes:

- To monitor or improve the quality and standard of services provided
- To use financial information for direct debit payments for services
- To communicate with Customers electronically, by telephone or mail in relation to services
- To contact Customers, next of kin or any other persons nominated to contact in the event of an emergency

CA regard these purposes as reasonably necessary for, or directly related to, one or more of our functions or activities as a service provider. CA will not collect sensitive information from Customers (as that term is defined in the Act), unless Customer consent is given and only if collection of such sensitive information is required in order to fulfil one or more services required/ expected by the Customer.

If customers do not provide information requested, CA may not be able to provide all agreed services.

CA may collect personal information from a third-party source. However, CA will only do so with Customer / Employee consent.

#### *1.2.6 Use or Disclosure of Personal Information*

CA will use and disclose personal information for the primary purpose for which it was provided.

CA may use or disclose customer / employee personal information for some other purpose, however only where:

- Customers / Employee would reasonably expect CA to use or disclose the information for the secondary purpose;
  - If the information is sensitive information - directly related to the primary purposes
  - If the information is not sensitive information - related to the primary purposes
- The use or disclosure of Customer / Employee personal information is required or authorised by or under an Australian law or a court / tribunal order
- A permitted general situation exists in relation to the use or disclosure of the information by CA
- CA reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

CA does not disclose personal information collected from Customers / Employees to third parties for the purpose of allowing such third parties to directly market products and services to Customers / Employees

#### *1.2.7 Quality of Personal Information*

- CA will take such steps necessary and reasonable in the circumstances to ensure that personal information collected about Customers / Employees is accurate, up to date and complete.
- CA will take such steps as are reasonable in the circumstances to ensure that the personal information used or disclosed is accurate, up to date, complete and relevant.

#### *1.2.8 Personal Information about Others*

Customers must not provide personal information to us about any another person, unless that person has authorised them to disclose such information. In this event, such disclosure will be subject to the terms of this Privacy Policy.

#### *1.2.9 Correction of Personal Information*

If personal information held by CA is inaccurate, out of date, incomplete, irrelevant or misleading and customers / Employee request CA to correct it, CA will ensure all reasonable steps are taken to correct the personal information to ensure that it is accurate, up to date, complete, relevant and not misleading.

#### *1.2.10 Access to Personal Information*

- If requested, CA will provide Employees and Customers with access to personal information held by CA, subject to any limitations that may arise according to APP legislation
- CA will deal with Employee and Customer requests for access within a reasonable time and in the manner requested, if it is reasonable and practicable to do so
- If CA refuses to provide access to personal information, CA will provide reasons for the refusal

CA notes there are exceptions to providing access to personal information set out in “APP 12.3”, most notably:

- If CA reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety
- Giving access would have an unreasonable impact on the privacy of other individuals
- The request for access is frivolous, vexatious or unlawful
- The information relates to existing or anticipated legal proceedings between CA and the customer, and would not be accessible by the process of discovery in those proceedings
- Giving access would reveal the intentions of the entity in relation to negotiations with the individual in such a way as to prejudice those negotiations
- Denying access is required or authorised by or under an Australian law or a court / tribunal order
- Giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body, or
- Giving access would reveal evaluative information generated by CA about a commercially sensitive decision-making process.

#### *1.2.11 Subscription to our email newsletter*

- If Customers become a subscriber from a CA website, social media activity or other CA activity they will receive emails or other communications containing information about CA services and at times those services offered by our Authorised Recipients or CA commercial partners,
- Customers are not obliged to sign up as a subscriber at any time. If customers do opt to become a subscriber, they may ‘opt out’ at any time by using the designated ‘unsubscribe’ function or procedure.

#### *1.2.12 Security of personal information*

- CA will take such steps as are reasonable in the circumstances to protect customer personal information from misuse, interference, loss, unauthorised access, modification or disclosure.
- Specifically, personal information is stored in hard copy or electronically in our data information storage systems. Accordingly, CA will maintain physical security, as well as network and computer security over paper and electronic data information storage systems.
- If CA hold your personal Information and;
  - It is no longer needed, for any purpose,
  - CA is not required by or under an Australian Law, or a court /tribunal order, to retain this personal information, CA will take such steps as are reasonable in the circumstances to destroy all Personal Information or to ensure that all Personal Information is de-identified.

#### *1.2.13 Complaints and other queries*

If Customers:

- Have a complaint about CA handling of personal information
- Have any questions regarding CA collection, use or disclosure of your personal information
- Wish to access or change their own personal information

Please contact the CA HR representative. CA will respond to customer queries or complaints within in a reasonable time and take all reasonable steps in the circumstances to resolve the matter in a timely manner.