

1. PURPOSE

To provide confidence that the way we handle personal information about our customers, employees and other individuals at GWMWater complies with the Victorian Information Privacy Principles (IPPs) contained in the *Privacy and Data Protection Act 2014 (Victoria)*.

2. SCOPE

This policy applies to Board Directors and staff of GWMWater, including, but not limited to, contractors and service providers engaged by GWMWater to undertake duties as may be required.

3. METHOD

Collection of personal information

In line with the *Privacy and Data Protection Act*, GWMWater collects personal information from you for the purposes of providing water and sewerage related services and engaging in community discussion where we seek your feedback and as otherwise required or permitted by law.

Personal information relating to you will only be collected where information is required to enable GWMWater staff, its contractors or service providers to perform one or more of their statutory functions under the *Water Act 1989*.

Information may be collected in a number of ways including, without limitation, in person, over the telephone, by correspondence, through the use of forms, email or via the GWMWater website.

Where we are advised accordingly, we may collect personal information in relation to family violence and financial hardship.

The type of information collected may include:

- identifying information (ie your name, date of birth and pension and concession card numbers)
- contact details (ie address, telephone number and email address)
- information relevant to your employment with us (ie tax file numbers and banking details)
- credit information
- health information
- real time water usage recorded by digital meters

We may also collect other information depending on the nature of your enquiry, for example information you provide to us when you:

- make an enquiry, request for service or complaint

- register a health care or pensioner concession card
- notify us of a physical, mental health or disability requiring uninterrupted service
- apply for a licence, permit or grant
- register your attendance at a meeting or event
- apply to work with us

This policy also applies to personal information that you provide when using our website. We use cookies to analyse our traffic to enable us to better customise content available to our customers.

If you don't provide us with the personal information that we require, then we may be unable to supply the services or products that you request.

Generally, we try to collect personal information directly from our customers, however there may be certain circumstances where we collect personal information from someone other than the customer, such as real estate agents, landlords, solicitors/conveyancers, or a legally appointed agent or authorised representative.

Under the *Privacy and Data Protection Act*, the concept of 'sensitive information' means information or an opinion about an individual's:

- racial or ethnic origin
- political opinions
- membership of a political association
- religious or philosophical beliefs or affiliations
- membership of a professional or trade association or trade union
- sexual preferences or practices, or
- criminal history

GWMWater will not collect any sensitive information unless your consent has been obtained, or one of the exemptions in the *Privacy and Data Protection Act* apply.

Under the *Health Records Act*, 'health information' includes information or opinion about:

- the physical, mental or psychological health of an individual
- a disability of an individual
- an individual's expressed wishes about the future provision of health services
- a health service provided or to be provided to an individual, that is also personal information

GWMWater will not collect health information unless your consent has been obtained or one of the exemptions in the *Health Records Act* applies.

We may request your information if:

- interruption to services would impact your health (ie because you are on dialysis)

- you are an employee and you are injured at work
- you are an employee and we otherwise need to know about your health information as part of your employment
- it is required under occupational health and safety laws

Use and Disclosure

Personal information will remain within GWMWater and will be used by employees in a manner that is consistent with the performance of their statutory duties. Our staff are educated on the importance of protecting your privacy and as such undertake regular training on privacy legislation.

GWMWater will from time to time engage contractors or service providers to perform some of its functions. This may involve the transfer of personal information to them so they can contact you about work they are doing on our behalf. All contractors or service providers engaged by GWMWater must adhere to this Privacy Policy and IPPs to ensure personal information is handled responsibly and remains secure at all times.

GWMWater may also use and disclose your personal information to relevant statutory agencies to facilitate our compliance with our statutory and legal obligations. We do not routinely transfer personal information outside of Victoria, although in some circumstances we may do so where we engage third party contractors outside Victoria or are required to disclose information by law (ie to the ATO).

If we need to transfer personal information about you to someone who is outside Victoria, we will only do so if we reasonably believe that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the Information Privacy Principles, you consent or as otherwise provided for in privacy legislation.

We will not use or disclose personal information we collect for any other purpose without your consent, unless permitted under privacy legislation.

We do not sell, rent, trade or otherwise make available your personal information.

Use and Disclosure (social media)

GWMWater also uses social networking platforms such as Facebook and LinkedIn to connect with customers. We recommend that customers read any terms and conditions (including any privacy statements or policies) that apply to any third-party web service, especially the terms and conditions relating to the handling of personal information, when using these social media platforms to interact with GWMWater. These third-party privacy statements and conditions may allow those third parties to use personal information in ways that will be different to the way GWMWater uses and discloses personal information. They will prevail over this privacy statement to the extent of any inconsistency but will not change the way in which GWMWater uses personal information.

GWMWater recommends that customers do not use a public-facing social media channel, such as Facebook, to provide us with personal details or disclose these personal details in any query or issue raised through that forum. This is necessary in protecting customer's privacy and keeping account details private, preventing identity theft or unauthorised people accessing account information. Examples of personal details that should not be published on these social media channels include home addresses, birth dates, middle or maiden names, account numbers or any details used in an ID check by GWMWater for verification purposes. We encourage customers to protect their personal information by contacting us through email, our website 'contact us' page, by post or by phone.

Protection of personal information

We take reasonable steps to protect personal information from misuse or loss and from unauthorised access, modification or disclosure.

We have appropriate procedures to safeguard and help prevent unauthorised access to personal information, to maintain data security and ensure we use and disclose the information we collect appropriately.

If you notify us that personal information we hold is not accurate, complete or up to date, then we will take action to correct the information in accordance with the requirements of the *Privacy and Data Protection Act*.

If you believe that any of the information we hold about you is inaccurate, incomplete or out of date, please write to us or phone us on 1300 659 961.

Data Security

GWMWater has security measures in place to protect personal information from misuse or loss and from unauthorised access, modification or disclosure. This includes confidentiality requirement for employees and contractors and having policies and systems in place for the handling of information.

We take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose.

If we are advised that a customer is experiencing family violence, we implement additional controls to safeguard the way in which we handle your personal information.

Access

You have the right to access and correct information about you that is held by GWMWater. In most cases, requests for access will be administered in accordance with the *Freedom of Information Act 1982*, particularly requests that may affect the privacy of another individual or relate to commercial activity. Very simple requests that involve information relating only to you may be dealt with informally.

Where an application is made for documents under the *Freedom of Information Act 1982* (VIC) (FOI Act), GWMWater will charge fees in accordance with the FOI Act.

Where you become aware of any inaccuracies in our records, or your details change, we request that you notify us as soon as possible.

Contact details

Requests for access to personal information may be requested through the Privacy Officer and will be dealt with in accordance with the IPPs or, where applicable, the *Freedom of Information Act 1982*.

Privacy Officer
GWMWater
PO Box 481
Horsham Vic 3400
Telephone: 1300 659 961
Email: privacy@gwmwater.org.au

If you are not satisfied with our response you can take the matter further by contacting the Office of the Victorian Information Commissioner on 1300 006 842 or email at enquiries@ovic.vic.gov.au.

4. RELATED LEGISLATION

- a) *Privacy Act 1988* (Commonwealth)
- b) *Privacy and Data Protection Act 2014* (Victoria)
- c) *Charter of Human Rights and Responsibilities Act 2006* (Victoria)
- d) *Health Records Act 2001* (Victoria)
- e) *Freedom of Information Act 1982* (Victoria)

5. RELATED POLICIES AND PROCEDURES

- a) Integrity Framework
- b) Public Interest Disclosures
- c) Social Media
- d) Records Management
- e) Compliance Management
- f) Information and Communications Technologies (ICT) Security

6. EXPECTED OUTCOMES

To provide adequate training to ensure Board Directors, staff, contractors and service providers are fully informed of their commitments and obligations under *Privacy Act 1988* (Commonwealth) and related legislation.

To uphold the integrity of personal information and provide assurance to individuals that this information is maintained within a secure environment.

7. DOCUMENTATION

Related and referenced documents:

- GWMWater Confidentiality Agreement
- Urban Customer Charter, GWMWater
- Rural Customer Charter, GWMWater
- Code of Conduct for Victorian Public Sector Employees, VPSC

8. DEFINITIONS

Refer to the corporation's standard definitions.