

## 6.06 Privacy Policy

### Related Policy: Knowledge Management

### Purpose & Objectives

Centacare, Catholic Diocese of Ballarat (Centacare) (ABN 51 857 084 361) is committed to complying with its obligations under the *Privacy Act 1998* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**).

Centacare is committed to respecting your privacy and protecting your rights with respect to your personal information.

From time to time Centacare may review and update this Privacy Policy, including to take into account new laws, regulations, practices and technology. All Personal Information held by Centacare will be governed by our most recent policy.

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#### 1 Introduction

This policy explains how Centacare manages and secures your personal information. It also describes the kinds of personal information that Centacare holds and for what purposes, and how that information is collected, held, used and disclosed.

This policy is available on Centacare's website at <http://www.centacareballarat.org.au/>

You may also request a copy of the policy by contacting the Privacy Officer in accordance with paragraph 12 of this policy.

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#### 2 What personal information do we collect?

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

Centacare 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, Medicare number, driver's licence, Centrelink number, passport and contact details;
- (b) bank account details;
- (c) financial transactions relating to your Centacare accounts;
- (d) tax file number; and
- (e) marital status.

Centacare may also need to collect sensitive information about you. 'Sensitive Information' is personal information that is also an information or opinion about your race or ethnic origin, political opinions religious beliefs or affiliations, philosophical beliefs, membership of a profession or trade association, membership of a trade union or political association, sexual orientation or practices, criminal records or health information.

Centacare will only collect sensitive information about you if:

- (a) you consent to the collection of the information and the information is directly related to Centacare's functions; or
- (b) the information relates:
  - (i) to the activities of Centacare; and
  - (ii) solely to the members of Centacare, or to individuals who have regular contact with Centacare in connection with its activities; or
- (c) the collection is otherwise permitted under the Privacy Act.

### **3 When and why we collect Personal Information**

We collect personal information about you so we can, among other things,

- (a) provide you with services and products;
- (b) meet our funding body requirements;
- (c) tailor the services we deliver;
- (d) meet our legal obligations; and
- (e) plan for the future.

Centacare will, if it is reasonable and practical to do so, collect personal information directly from you. Centacare may collect your information when you:

- (f) give Centacare information over the telephone;
- (g) give Centacare information via the Centacare website;
- (h) interact with Centacare electronically or in person; and
- (i) complete application forms.

On occasion Centacare may collect personal information about you from other sources where it is necessary to do so. Examples of other sources that Centacare may collect personal information from include, but are not limited to:

- (a) schools;
- (b) your relatives;
- (c) The Department of Social Services or other government agencies;
- (d) Centacare's service providers; and
- (e) information that is publicly available on the electoral roll.

If you do not provide Centacare with your personal information, it may not be able to:

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

If Centacare inadvertently collects personal information about you that it did not ask for, Centacare will check whether it could have collected that information itself. If Centacare could have collected the information, Centacare will handle it in the same way it handles other information it collects from you. If:

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

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

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### **4 Information collected via the Centacare Website**

*Centacare will not collect personal information about you when you use its website except when you knowingly provide it, or as otherwise described below.*

#### *Cookies*

"Cookies" are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns.

If you access the Centacare website, a cookie is downloaded onto your computer's hard drive when you first log onto the website. Third parties will not be able to access your personal information through our use of cookies. If you prefer not to receive cookies, you can set your internet browser to notify you when you receive a cookie and then reject or accept the cookie.

#### *Google Analytics*

Centacare also uses Google Analytics to collect information about how people use its website. Google Analytics does this by using cookies to understand the types of websites you visit and the way you

interact with those websites.

The information Centacare obtains from Google Analytics helps it understand user needs and offer a better user experience. By using the Centacare website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy which is available at URL: <http://www.google.com/intl/en/policies/privacy/>. You can opt out of Google Analytics by using the Google Analytics opt-out browser add-on. Further information is available at URL: <https://tools.google.com/dlpage/gaoptout>.

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## **5 Storing personal information**

Centacare holds your personal information in different ways, including paper and electronic form. Centacare treats all personal information as confidential. It will take reasonable steps to ensure personal information is protected from misuse, interference and loss and unauthorised access, modification and disclosure.

Some of the ways Centacare does this are:

- (a) confidentiality requirements for employees;
- (b) contractual obligations with our service providers including CCVT and its service providers who provide data base services to Centacare;
- (c) secure document storage facilities;
- (d) security measures for access to systems;
- (e) only giving access to personal information to a person who is verified to be able to access that information;
- (f) security obligations on third party information technology service providers;
- (g) control of access to buildings; and
- (h) electronic security systems, such as firewalls and data encryption, user identifiers, passwords or other access codes, antivirus, antispyware, backup and recovery of systems.

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

- (a) the information is contained in a Commonwealth record; or
  - (b) Centacare is required by law, or a court/tribunal order, to retain the information.
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## **6 How we use your personal information**

Centacare uses and discloses your personal information to provide products and services to you which including:

- (a) assessing your account applications;
  - (b) establishing and administering your accounts;
  - (c) verifying your identity;
  - (d) for customer relations purposes, including managing Centacare's relationship with you;
  - (e) to provide you with services, including under the National Disability Insurance Scheme;
  - (f) to comply with Centacare's obligations to the Department of Social Services;
  - (g) to comply with any applicable laws, regulations or codes of practice;
  - (h) to comply with any payment systems requirements;
  - (i) for information technology systems development and testing where Centacare's internal computer system is upgraded;
  - (j) for Centacare's internal operations, including record keeping, risk management, auditing, training, file reviews and account analysis;
  - (k) to investigate, resolve and prevent complaints;
  - (l) to make arrangements with other organisations to provide services in relation to Centacare's products and services (for example, Centacare may arrange for mailing houses to distribute account statements);
  - (m) to conduct fraud assessments;
  - (n) for reporting and data analytics purposes, including for regulatory, management, statistical or research purposes; and
  - (o) for any other purpose for which you have given your consent.
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## **7 Use and disclosure of information**

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

- a) Centacare's service providers including CatholicCare Victoria Tasmania ACN 150 113 947 (CCVT) and providers of information technology services to CCVT;
- b) Centacare's agents, contractors and external advisors (for example, Centacare lawyers, auditors, and information technology service providers);
- c) any person acting on your behalf, including your legal and financial advisers;
- d) Government and other regulatory bodies (including the Department of Social Services), law enforcement bodies and courts as required or authorised by law; external dispute resolution bodies; and
- e) financial institutions.

We will not use or disclose the personal information we collect for a particular purpose for any other purpose without your consent, unless we are permitted to by law. We will not disclose your information to a third party, whether in Australia or overseas, without your consent.

For most of our services we use a common client management software and database to process and store your personal information. This software and database is licensed by CatholicCare Victoria Tasmania (ABN 150 113 947) (CCVT) and is hosted and maintained by its contracted service providers.

If you wish to opt out of your personal information being entered into this common database, please contact the Privacy Officer listed in paragraph 11. However, if you opt out this may affect the services that Centacare can provide to you.

Centacare will not disclose your personal information to any overseas recipients. Centacare does engage third party information technology service providers to store your data, however we ensure that your data is stored within Australia.

Where your personal information is disclosed, Centacare will seek to ensure that information is either de-identified, or is used, held and disclosed consistently with the Privacy Act and any other applicable laws.

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## **8 Quality of personal information**

Centacare will take all reasonable steps to ensure that any personal information it collects, uses or discloses is accurate, complete, up-to-date and relevant to Centacare's functions or activities.

If you believe that your personal information is not accurate, complete or up to date, you should contact the Privacy Officer in accordance with paragraph 12 of this policy.

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## **9 Access to personal information**

You can access your personal information unless an exception in the Privacy Act applies.

You can request access to your personal information at any time by contacting the Privacy Officer in accordance with paragraph 12 of this policy. Depending on the nature of the request, Centacare may charge you a small fee for granting you access.

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

Sometimes, it may not be possible for Centacare to give you access. If Centacare refuses to give you access, it will:

- (a) take reasonable steps to give you access in a manner that meets Centacare's needs as well

- as yours;
- (b) provide you with written reasons for the refusal provided it is reasonable to do so; and
  - (c) provide you with the mechanisms available to complain about the refusal.

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## 10 Correcting personal information

If you think that any personal information Centacare holds about you is incorrect, inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request Centacare to correct the information by contacting the Privacy Officer in accordance with paragraph 12 of this policy.

Centacare will take all reasonable steps to correct that information to ensure that, having regard to the purposes for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading. If Centacare corrects personal information that has been disclosed to another entity and you ask Centacare to tell the other entity about the correction, Centacare will take all reasonable steps to tell the other entity about the correction, unless it is impractical or unlawful to do so.

If Centacare refuses to correct the personal information, then it will provide you with:

- (a) written reasons for the refusal provided it is reasonable to do so; and
- (b) the mechanism available to complain about the refusal.

Centacare must respond to a correction request within a reasonable time (usually 30 days).

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## 11 Anonymity

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

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## 12 Complaints or queries

If you:

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

you are requested to contact the Centacare Privacy Officer at:

Email: [privacy@centacareballarat.org.au](mailto:privacy@centacareballarat.org.au)  
Telephone: (03) 5337 8999  
Post: PO Box 2537, Bakery Hill VIC 3354  
Visit: 4-6 Peel Street Nth, Ballarat VIC 3350

If Centacare's Privacy Officer is unable to resolve the matter, it will be escalated (internally or externally) as appropriate to facilitate resolution.

If you are not happy with the outcome of Centacare's Privacy Officer's investigation, then you can raise your concern with the Office of the Australian Information Commissioner (OAIC):

Office of the Australian Information Commissioner

Telephone: 1300 363 992  
Email: [enquiries@oaic.com.au](mailto:enquiries@oaic.com.au)  
Mail: GPO Box 5218, Sydney, NSW 2001  
Web: [www.oaic.gov.au](http://www.oaic.gov.au)

## Document History:

Adapted June 2020: changes include:

- updated shared database statement and disclosure statement to reflect CCVT requirement