

## 1. POLICY

FEAT is committed to protecting the privacy of personal information. The purpose of this policy is to outline how and what kind of personal information FEAT will collect, use, store, share and dispose of in line with the Privacy Amendment (Enhancing Privacy Protection) Act 2012 and the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth).

## 2. DEFINITIONS

**Personal information** means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

**Sensitive information** means:

- a) information or an opinion about an individual's:
  - i. racial or ethnic origin;
  - ii. political opinions;
  - iii. membership of a political association;
  - iv. religious beliefs or affiliations;
  - v. philosophical beliefs;
  - vi. membership of a professional or trade association; or
  - vii. membership of a trade union; or
  - viii. sexual preferences or practices; or
  - ix. criminal record; that is also personal information; or
- b) Health information about an individual; or
- c) Genetic information about an individual that is not otherwise health information.

## 3. KINDS OF PERSONAL INFORMATION COLLECTED AND HELD

Through conducting our business, we may need to collect personal and sensitive information from those that we interact with. The type of information that we may collect from individuals will depend upon the service being provided. Examples of information collected include, but is not limited to:

- Name, title, address;
- Telephone numbers;
- Email address;
- Records of communication with FEAT;
- Passport and visa details;
- Previous, current and future employment details;
- Family details, including relationship status, names and ages;
- Bank account and / or credit / debit card information;
- Salary details;
- Health records;
- Website usage information.

#### 4. HOW AND WHY WE COLLECT AND USE PERSONAL IDENTIFIABLE INFORMATION

FEAT does not collect personally identifiable information about individuals except when such individuals specifically provide such information on a voluntary basis which is reasonably necessary for, or directly related to, one or more of FEAT's functions or activities.

If FEAT is not able to collect all or some of the personal information required, we may not be able to provide our services. Personal information is collected in a number of ways including:

- Online, through the FEAT website, another website or via email
- Over the phone
- In person
- By a third party, such as a client providing limited details of their employee

Personal information is collected for a variety of reasons, some examples include:

- Conducting, improving, maintaining and developing a business relationship;
- Quoting, planning, processing and delivering our services;
- Responding to individuals' queries;
- Marketing; and
- Improving the FEAT website.

All personal information is stored electronically on the FEAT secure network and / or in hardcopy stored in secure cupboards and cabinets.

FEAT does not disclose your personal information for any secondary purposes unless your consent has been given or as required by law.

#### 5. MEANS OF COLLECTION OF INFORMATION

FEAT only collects information by lawful and fair means. FEAT only collects personal information about an individual from that individual unless it is unreasonable or impractical to do so.

#### 6. UNSOLICITED PERSONAL INFORMATION

If FEAT receives unsolicited personal information about an individual that it could have collected upon requesting it from the individual, it may be used, stored or shared if it is reasonably necessary for, or directly related to, one or more of FEAT functions or activities.

FEAT takes reasonable steps to ensure unsolicited personal information that is not needed is destroyed immediately or de-identified (all identifying features are removed).

#### 7. DISCLOSURE OF PERSONAL INFORMATION TO EXTERNAL BODIES

To provide our services, FEAT may be legally required to disclose your personal information to Government agencies, such as the Australian Taxation Office.

FEAT may also need to disclose your personal information to our contracted service partners and business advisors to complete your service..

By signing the FEAT Service Agreement, you consent to FEAT disclosing your personal information where it is reasonably necessary for the sole purpose of facilitating our services.

## **8. GOVERNMENT IDENTIFIERS**

FEAT does not adopt, use or disclose government related identifiers (such as a passport number or tax file number) of an individual unless it is reasonably necessary to verify the identity of an individual or fulfil our obligations to a Government agency.

## **9. SECURITY OF PERSONAL INFORMATION**

FEAT will take reasonable steps to ensure that any personal information held is protected from:

- a) misuse, interference, loss; and
- b) unauthorised access, modification or disclosure.

## **10. DESTRUCTION OF PERSONAL INFORMATION**

When personal information about an individual is no longer needed for the purpose for which it was collected (taking into account legal requirements for retaining certain information), FEAT will ensure the secure destruction or de-identification of such information.

## **11. ANONYMITY & PSEUDONYMITY**

An individual has the option of using a pseudonym when dealing with FEAT.

However, individuals should be aware that there will be limitations to the services that FEAT is able to provide unless some identifying information is provided (the level of information depends on the service being provided).

## **12. DIRECT MARKETING**

From time to time, FEAT may contact you regarding our services using the personal information (not sensitive information) you have supplied to us.

If you do not want to receive marketing information, please advise your point of contact at FEAT. If you are not sure who this is, you can contact the Privacy Officer (contact details outlined at the end of this policy) who will assist you or direct you to the most appropriate person.

We will not provide your information to any third party for the purpose of direct marketing.

### 13. ACCESSING PERSONAL INFORMATION

An individual can access personal information held by FEAT about themselves by making contact with their point of contact at FEAT, except where an exception applies (please see exceptions listed below). If they are unsure who to contact, they should contact the GENERAL MANAGER.

FEAT will respond to the request for access to the personal information within a reasonable period after the request is made. FEAT will give access to the information in the manner requested by the individual, if it is reasonable and practicable to do so.

Circumstances under which an individual would not be given access to their information include:

- a) FEAT 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; or
- b) Giving access would have an unreasonable impact on the privacy of other individuals; or
- c) The request for access is frivolous or vexatious; or
- d) The information relates to existing or anticipated legal proceedings between FEAT and the individual, and would not be accessible by the process of discovery in those proceedings; or
- e) Giving access would reveal the intentions of FEAT in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
- f) Giving access would be unlawful; or
- g) Denying access is required or authorised by or under an Australian law or a court / tribunal order; or
- h) Both of the following apply:
  - i. FEAT has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to FEAT' functions or activities, is being or may be engaged in;
  - ii. Giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
- i) Giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- j) Giving access would reveal evaluative information generated within the entity in connection with a commercially sensitive decision-making process.

If FEAT elects not to give access to the information for one or more reasons outlined above, we will take reasonable steps to give access in a way that meets the needs of FEAT and the individual. The individual will be provided with a written notice that sets out:

- a) The reason for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and
- b) The mechanisms available to complain about the refusal.

### 14. CORRECTING PERSONAL INFORMATION

An individual can correct personal information held by FEAT about themselves by making contact with their point of contact at FEAT. If they are unsure who to contact, they should contact the FEAT Office and speak to the General Manager (contact details outlined at the end of this policy) who will assist

them or redirect their enquiry to a more appropriate person. FEAT will respond to the request for correction to the personal information within a reasonable period after the request is made.

If FEAT has corrected personal information about an individual that we have previously disclosed to a third party, and the individual requests that FEAT notifies the third party of the correction, we will take reasonable steps to give that notification unless it is impracticable or unlawful to do so.

If FEAT refuses to correct the personal information as requested by the individual, we will provide a notice to the individual which sets out:

- a) The reasons for the refusal except to the extent that it would be unreasonable to do so; and
- b) The mechanisms available to complain about the refusal.

If FEAT refuses to correct the personal information as requested by the individual, the individual may request FEAT to associate a statement outlining that the information is inaccurate, out of date, incomplete, irrelevant or misleading. FEAT will take such steps as are reasonable in the circumstances to associate the statement in such a way that will make the statement apparent to users of the information.

**15. MORE INFORMATION / COMPLAINTS**

If you would like to make a complaint related to FEAT breaching the Australian Privacy Principles (APPs) or would like further information on the way that FEAT collects, uses, stores shares and disposes of your information, please contact the General Manager.

**16. AVAILABILITY OF THE POLICY**

This policy is available on the FEAT Company website (<http://www.FEAT.com.au>). Alternatively, you can request a copy in person, by phone (07) 4772 1450 or email, [reception@feat.org.au](mailto:reception@feat.org.au) and we will provide a hard copy or send it to you by your preferred method (email or physical mail).

**Other related policies and procedures**

Related Policies	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Grievance Policy</li> </ul>
Forms of other organisational documents	

**Review Processes**

<b>Policy review frequency:</b>	<b>Responsibility for review:</b>
Two-year review or as required	Manager

**Review Process:** Staff may submit amendments to the Manager for consideration at any time. The Manager will consider the amendments and update the Policy as required. The Management Committee will ratify changes to the Policy.

**Documentation and Communication:** the Manager will ensure redundant versions of this policy are removed from the electronic and paper-based files and that staff and all other relevant people are advised of the updates through training/staff meetings.