

1 Purpose

- 1.1 This policy sets out how Hume Community Housing (**Hume**) collects, stores, uses and discloses personal and health information and the circumstances in which Hume may share this information with others.

2 Scope

- 2.1 This policy applies to all Hume Customers, housing applicants, Employees, and other parties whose personal information is collected, used, stored and disclosed by Hume in its delivery of housing and housing related services.

3 Policy Statement

- 3.1 Hume respects an individual's right to privacy. This Privacy Policy sets out how Hume manages personal information, including health information, in accordance with its legislative and contractual obligations, including the *Privacy and Personal Information Protection Act 1998 (NSW)*, the *Health Records and Information Privacy Act 2002 (NSW)* and the *Privacy Act 1988 (Cth)*. The Policy sets out how Hume seeks to comply with the Australian Privacy Principles, the NSW Information Protection Principles, and the NSW Health Privacy Principles.
- 3.2 This Policy sets out:
- how Hume collects information and from whom;
 - the kinds of personal information Hume collects and holds;
 - how personal information is stored and managed by Hume;
 - the purpose for which personal information is used and disclosed by Hume;
 - how you can access and/or correct your personal information; and
 - Hume's privacy complaints process.

4 Collection of Personal Information

What Personal Information is collected?

- 4.1 Hume collects personal information to provide appropriate housing services and other assistance to its Customers, household members and housing applicants.
- 4.2 Personal information is information about an individual whose identity is apparent or can reasonably be ascertained from the information. Health information is a type of Personal Information which may include information about a person's physical or mental health or disability. Sensitive Information is Personal Information that may include information about a person's race/ethnicity, religion, sexual orientation or practices, criminal record, political opinions or associations, trade union membership or associations, health or genetic information.
- 4.3 In general, the types of Personal Information that Hume may collect, include but is not limited to:
- Names, addresses and other contact details;
 - Dates of birth;
 - Next of kin / emergency contact details;
 - Nationality, country of birth, languages spoken at home;
 - Government identifiers (such as Centrelink CRN numbers);

- Financial information including, employment details, income, family court orders;
- Medical histories, disability information, support letters from health care professionals; and
- Photographic images and video footage.

How is Personal Information collected?

- 4.4 Hume will only collect your Personal Information from you, unless:
- you consent to the collection of information from someone else;
 - Hume is required or authorised by law to collect the information from someone else; or
 - it is unreasonable or impracticable to collect the information from you (for example you are a child, you are in custody, or you do not have capacity).
- 4.5 Hume uses standard forms to collect Personal Information reasonably necessary to carry out its functions and provide its services. Hume may also obtain Personal Information by email, correspondence, text messages or other mobile messaging/social media platforms, through financial transactions, face-to-face meetings or over the telephone. We may record phone conversations as appropriate, however you will be notified prior to the recording on the phone when this occurs, and you can elect not to be recorded.
- 4.6 Hume may also collect Personal Information from other people or organisations (for example, referring agencies, service providers, health care providers) or independent sources (for example, telephone directories). Hume will only collect Personal Information from other people or organisations when it is not reasonable or practicable to collect the information from you directly.
- 4.7 Sensitive Information will only be collected with your consent and when the information is reasonably necessary for one of Hume's functions, operations or activities.

Unsolicited Personal Information

- 4.8 Hume may sometimes receive Personal Information that it did not request. This is called unsolicited information. If the unsolicited information does not relate to one or more of Hume's functions or activities Hume will destroy or de-identify the information as soon as practical.

Anonymity

- 4.9 You can contact Hume without identifying yourself or by using a fictitious name. Hume will only be able to provide general information about the services we provide in these circumstances. Hume will not be able to give you information or provide assistance based on your individual circumstances if you choose not to identify yourself.

Privacy and our Website

- 4.10 We might use 'cookies' to collect data to help us manage our website and improve our online services. 'Cookies' are small files placed on your computer when you visit a website. 'Cookies' capture how often you visit pages and other data about browsing preferences. 'Cookies' are used to for technical reasons to allow certain products and features of our site to operate, others are used to enhance user experience, and some are used for analytic purposes. Users can configure their browsers to manage, accept or reject cookies.
- 4.11 Our website might contain links to other sites. These websites are not subject to our policies and privacy standards. We cannot guarantee the privacy practices of the websites. Users should read and understand the privacy policy of those other websites before using them.

5 Use of Personal Information

How is Personal Information used?

- 5.1 Hume uses Personal Information to provide housing and related services (the primary purpose). We may also use Personal Information for a related secondary purpose, which is a purpose reasonably expected by you, or to which you consent. Only Personal Information that is reasonably necessary will be used.

Use of Personal Information for Primary Purpose

- 5.2 Hume's primary purpose for obtaining and using Personal Information includes, but is not limited to:
- assessing your eligibility for different housing options and assistance;
 - determining your housing needs;
 - managing your current tenancy, including maintenance and repairs and collection of rent and other charges;
 - assessing any requests for alternations or modifications to your current property, or a transfer request
 - connecting Customers to other services provided by Hume support partners, health providers or other third parties as necessary;
 - keeping you informed about community housing matters;
 - conducting Customer satisfaction surveys;
 - improving our business operations and procedures, including data analysis, staff training and system development (we will use de-identified information wherever practicable);
 - administrative requirements, including insurance purposes;
 - complying with Government and other reporting requirements, including mandatory reporting requirements and any child protection obligations;
 - to provide information to law enforcement, legal advisors, and Government agencies at all levels;
 - marketing and promotional activities.

Use of Personal Information for Secondary Purpose

- 5.3 Hume may use Personal Information for a secondary purpose. A secondary purpose is one that is related to the primary purpose for which the information was collected and may include such things as facilitating access to support services.

Use of Sensitive Information

- 5.4 Sensitive Information can only be used for the primary purpose for which it was collected, unless you would reasonably expect us to use or disclose the information for a directly related secondary purpose.
- 5.5 Examples of how Hume may use Sensitive Information include, but are not limited to:
- organising and/or providing you with translation services;
 - considering eligibility for and providing supported or priority housing;
 - ensuring Hume staff respect the religious and cultural customs of Customers when entering properties for inspection;
 - assessing requests for modifications to your property.

Government Identifiers

- 5.6 Hume will not use an Australian Government identifier (such as a Tax File Number or Centrelink Reference Number) as its own. Hume may record Government Identifiers and will only use or disclose them for a permitted purpose. A permitted purpose includes, but is not limited to, when it is reasonably necessary to verify the identify of an individual, to fulfil Hume's obligations to Commonwealth agencies or State or Territory authorities (for example, Centrelink), or when required by law or a court/tribunal order.

Direct Marketing

- 5.7 When Personal Information is collected from you, we may ask if you consent to receiving material from Hume about our services and initiatives and/or information and notifications about support services provided by other organisations that may be beneficial to Hume Customers. If you do not consent, we will not use your Personal Information for this purpose.
- 5.8 If you have consented to receiving this material, you can “opt out” from receiving these types of communications at any time either by clicking an ‘Unsubscribe’ link at the end of an email (where relevant) or by contacting the Hume Customer Service Centre on (02) 9722 4300.

Use of Photographs and/or Videos

- 5.9 Hume will obtain an individual’s consent before taking and/or using any images of Customers for promotional purposes. In some cases, we may ask you to sign a Consent Form.
- 5.10 In cases where it is difficult to gain informed consent before taking photographs or video footage (for example, at a large event), Hume will use reasonable means to give notice to people attending the function that photographs and/or video footage will be taken and may be used for specified purposes. Hume respects individual privacy and will not use an image or video of an individual who advises Hume that they do not wish for an image and/or footage of them to be used.
- 5.11 Hume takes special care in the publication of images and footage of children, acknowledging that it is prohibited from publishing information about children in certain circumstances (even if consent has been provided). Hume will seek the consent of the child’s parent or legal guardian before any images and/or footage is obtained or published (where permitted).
- 5.12 Hume uses video surveillance / CCTV systems in strategic internal and external locations at our offices and the common areas of some of the properties we manage. These camera systems may record footage of Customers, Employees, Contractors and other individuals on our premises. The surveillance is undertaken continuously. Cameras used for this purpose will be clearly visible. Footage is stored securely and only used to investigate incidents. It may be disclosed to police including where disclosure is lawfully required in connection with the investigation or prosecution of an alleged crime.

6 Integrity of Personal Information

Accuracy of Personal Information

- 6.1 Hume takes all reasonable measures to ensure that the Personal Information it collects, holds, uses and discloses is accurate, complete and up to date.
- 6.2 You must tell Hume if any of the Personal Information provided to us about you has changed or is incorrect.

Security and Storage of Personal Information

- 6.3 Hume stores Personal Information in a variety of ways, including electronic databases, hard copy files and on personal devices such as mobile phones and laptop computers.
- 6.4 The security of the Personal Information Hume collects and stores is of utmost importance to us. Hume takes a number of reasonable measures to protect Personal Information from misuse, interference, loss, unauthorised access, modification or disclosure. These steps include but are not limited to:
- password protection for accessing our electronic IT system with two factor authentication;
 - 24-hour IT security operation centre and penetration testing;
 - directing staff not to reveal or share passwords;
 - providing ongoing cyber security and privacy training;
 - storing all hard copy files in locked filing cabinets;
 - ensuring all office premises are secure, with swipe pass locks, alarm systems and CCTV security;

- ensuring staff follow internal policies and procedures when handling Personal Information;
- requiring that all third-party service providers who may have access to Personal Information comply with the Australian Privacy Principles or a similar privacy scheme;
- ensuring Personal Information that is no longer needed or required to be kept is destroyed in a secure manner.

Data Breaches

- 6.5 Hume will take all appropriate action if it has reasonable grounds to believe there has been a data breach. Hume will assess and respond to any actual or suspected data breach in accordance with the requirements contained in the *Privacy Act*. This may include a review of our systems, policies and procedures, taking remedial action and/or making changes to our system and procedures where necessary. In certain circumstances Hume may need to notify the Office of the Australian Information Commissioner (OAIC) and/or the NSW Privacy Commissioner. Hume will notify an individual if their Personal Information is involved in an eligible data breach that is likely to result in serious harm and provide information about steps the individual should take in response to the breach. If we are unable to notify individuals, we will publish a statement on our website.

7 Disclosure of Personal Information

Disclosure of Personal Information to third parties

- 7.1 Hume may need to disclose Personal Information to third parties in order to perform its functions and provide housing services and assistance to you. The types of third parties we may disclose your Personal Information to include government agencies, service providers, contractors, other support agencies and other recipients from time to time. We will only disclose your Personal Information to a third party if:
- you have consented; and/or
 - you would reasonably expect the Personal Information to be disclosed.
- 7.2 There are situations where we may disclose Personal information without your consent or when you would not reasonably expect us to. This may happen if:
- the disclosure is required or authorised by law or a court/tribunal order;
 - the disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
 - the disclosure is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body;
 - we are asserting a legal or equitable claim.

Disclosure of Personal Information to overseas recipients

- 7.3 Wherever possible Hume tries to ensure Personal Information is not disclosed to overseas recipients. However, Personal Information may be processed by or disclosed to employees or other third-party software providers operating outside of Australia who work for or a contracted with Hume for the purposes of providing IT Support and Management Services. For example, some of our vendors have support personnel who are based in the USA, India, UK, and South Africa.
- 7.4 Hume will take all reasonable steps in the circumstances to protect any information transferred or stored outside of Australia and/or to ensure the overseas recipient is required to comply with laws or obligations that have the effect of protecting Personal Information in a similar way to the Australian Privacy Principles and that there are mechanisms for a person to enforce their rights for any breaches of privacy of their Personal Information.

8 Accessing your Personal Information

- 8.1 You have a right, on request, to access your own Personal Information held by Hume. You will need to verify your identity before being granted access or correcting any information held by us. Hume aims to respond to a request for access to Personal Information within 30 days of the request being made. Unless a specific

exception applies, you will be granted access to your Personal Information. Hume does not charge a fee in relation to requests for access or the provision of Personal Information.

- 8.2 There may be reasons why Hume cannot grant you access to your Personal Information. These include situations where the information relates to existing or anticipated legal proceedings, access would have an unreasonable impact of the privacy of other individuals, or access would pose a serious impact to an individual's life, health or safety. There are also other permitted reasons why Hume may not grant access under the Privacy Act. Hume will advise you in writing if your request to access your Personal Information is denied.
- 8.3 If you are unhappy with Hume's handling of your request, you can lodge a complaint with Hume (see the Complaints Procedure section below) or you may refer your complaint to:

The NSW Information Privacy Commissioner:
Email: ipcinfo@ipc.nsw.gov.au
Address: GPO Box 7011, Sydney NSW 2001

The Australian Privacy Commissioner:
Email: enquiries@oaic.gov.au
Address: GPO Box 5218, Sydney NSW 2001

9 Complaints Procedure

- 9.1 If you believe Hume has not complied with this Policy or that it has breached any applicable privacy laws, you can make a complaint.
- 9.2 All privacy complaints should be addressed to our Legal, Risk and Compliance Team:

Legal, Risk and Compliance
Email: LRC@humehousing.com.au
Address: Hume Community Housing, 7 Hamilton Road, Fairfield, NSW 2165

- 9.3 The complaint will be handled in accordance with Hume's Complaints Policy and Procedure. Hume will investigate the complaint. We may need to request some further information from you to provide a full and complete response. Hume will determine what action (if any) is needed to resolve the complaint and will provide you with a written response as soon as is reasonably practical.

10 Responsibilities

10.1

| Role or responsibility | Position or delegation level |
|--|--|
| Developing the process for this policy | Manager, Risk and Compliance |
| Ensuring policy aligns with compliance obligations | Manager, Risk and Compliance |
| Approving Policy | Governance Audit and Risk Committee (GARC) |
| Implementation | All employees |
| Policy review | Every 3 years |

11 Definitions

Contractor: is a third-party worker engaged to complete work at any Hume property.

Customer: is a Hume tenant or resident or participant in a Hume program or service, and includes a potential tenant, resident or participant, or an applicant for Hume programs or services.

- Employee:** includes Hume paid employees, Hume volunteers and students on placement at Hume
- Health Information:** is a type of Personal Information which may include information about a person's physical or mental health or disability
- Personal Information:** is information about an individual whose identity is apparent or can reasonable be ascertained from the information
- Sensitive Information:** is Personal Information that may include information about a person's race/ethnicity, religion, sexual orientation or practices, criminal record, political opinions or associations, trade union membership or associations, health or genetic information

12 Related Legislation and Documents

- [Children and Young Persons \(Care and Protection\) Act 1998 \(NSW\)](#)
[Health Records Information Protection Act 1998 \(NSW\)](#)
[Privacy Act 1988 \(Cth\)](#)
[Privacy and Personal Information Protection Act 1998 \(NSW\)](#)
[Spam Act 2003 \(Cth\)](#)

13 Feedback and questions

- 13.1 Customers can provide feedback at any time by contacting the Customer Service Centre on 9722 4300.
- 13.2 Hume employees may provide feedback about this document by emailing the Legal, Risk and Compliance team at LRC@humehousing.com.au.

14 Approval and Review Details

| Approval and Review | Details |
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| Approval Authority | Governance Audit and Risk Committee (GARC) |
| Policy Owner | Chief Financial Officer |
| Next Review Date | August 2025 |
| Policy History | Details |
| Original Approval Authority and Date | Board 19/10/2021 |
| Amendment Authority and Date | Board 23/08/2022 |
| Notes | <ul style="list-style-type: none"> This document replaces Privacy Policy, version 004 that was approved 23/10/2018. To be uploaded on Hume Housing Website |