



# CHL Privacy Policy (Version 5.0)

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## 1. Introduction and Scope

This policy is applicable to Community Housing Limited and its related entities in Australia (“CHL”) including Community Housing Ltd, Community Housing (Vic) Ltd, Community Housing (TAS) Ltd, and Community Housing (QLD) Ltd and any other entities within the CHL which adopt this policy.

This policy sets out how CHL manages the ‘personal information’ (defined below) it collects about customers, suppliers and any other persons whose personal information is protected under Privacy Act 1988 (Cth) (“Privacy Act”) and the Australian Privacy Principles (“APPs”).

A copy of the APPs may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

This policy does not apply to personal information exempt from the Privacy Act, such as employee records.

## 2. What is personal information and how is it used?

### 2.1. PERSONAL INFORMATION

'Personal information' means information or an opinion, whether the information or opinion is true or not, about an identified individual, or an individual who is identifiable.

Examples of personal information CHL collects from, or about, an individual includes, but is not limited to:

- Contact information (name, address, contact numbers)
- Personal details (date of birth, signature, bank account details, government related identifiers)
- Social information (household make up, rental history, income details, employment history)

### 2.2. SENSITIVE INFORMATION

In addition to the personal information collected, 'sensitive information' about an individual may also be collected by CHL in certain permitted circumstances.

Sensitive information includes, but it not limited to, information pertaining to ones:

- Sexual orientation and preferences
- Race or ethnic origin
- Personal beliefs (religious, philosophical)
- Political association or membership
- Health information (health conditions, disability, genetic or biometric information)
- Criminal record

## 3. Collection, Use and Disclosure

### 3.1. HOW DOES CHL COLLECT PERSONAL INFORMATION?

#### (a) General collection

Collected information will be lawfully and fairly obtained by CHL from the individual (unless it is unreasonable or impracticable). For example, personal information may be collected through requests for financial assistance, rental applications, property inspections, correspondence and browser cookies and other forms of online engagement.

At the time of collection (or as soon as practicable afterwards) CHL will take reasonable steps to ensure that the individual is advised, where applicable:

- How they can contact CHL in relation to their personal information;
- That they can access the information subject to certain exceptions;
- Why the information is collected;
- The disclosure practices of CHL; and
- Any law that requires the information to be collected and the main consequences (if any) for the individual if all or part of the information is not provided.

In some circumstances CHL may be provided with personal information about an individual by third parties or other indirect source.

Where the individual has not provided prior consent to the collection of their personal information from a third party or other indirect source, CHL will take reasonable steps to ensure that the individual the personal information is related to is made aware of the information collected.

### **(b) Cookies**

CHL's websites use and collect data via 'cookies'. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. When an individual visit CHL's websites, personal information may be collected automatically through cookies or similar technology.

An individual can set their browser not to accept cookies. However, in a few cases, some website features may not function as a result.

## **3.2. HOW DOES CHL USE PERSONAL INFORMATION?**

CHL collect and uses personal information for a range of primary purposes, including for housing services, design and construction services, property maintenance, project services, community development, internal corporate services and for governance purposes.

Subject to the APPs, CHL may use personal information or sensitive information for reasons other than a primary purpose, being a secondary purpose. For example, CHL may use personal information for a secondary purpose if the individual has consented, it is reasonably expected that the secondary use is related to the primary purpose, use is required by law or necessary for an enforcement related activity.

CHL uses cookies in a range of ways to improve an individual's website experience, including but not limited to keeping the individual signed into any available portals and understanding how users engage on a website.

## **3.3. HOW IS PERSONAL INFORMATION DISCLOSED?**

Where personal information is collected by one company within CHL, this information may be shared to its related body corporate where it relates to the primary purpose for which it was collected or any other applicable secondary purpose under the APPs, such as where the individual has consented to the disclosure or where required by law.

CHL may disclose personal information to third parties in accordance with this policy where disclosure is reasonably expected or where otherwise permitted by the APPs, for example where the individual has consented to the disclosure.

If required, personal information may be disclosed to third party recipients overseas where CHL holds a reasonable belief that the recipient will uphold the privacy standards set out in this policy.

Subject to any APP exemptions, CHL will not use or disclose personal information that it holds about an individual for the purpose of direct marketing. CHL will obtain the consent of the individual before using or disclosing sensitive information for the purpose of direct marketing.

## **4. Security and Storage**

CHL makes every effort to safeguard collected information and will take reasonable steps to protect the information it holds from misuse, loss, unauthorised access, modification, interference or unlawful disclosure.

CHL has measures in place to manage security and storage risks including established IT systems and protocols, regular audits and staff training.

CHL will also take steps to destroy or permanently de-identify personal information where it considers it no longer needed, subject to any requirements at law.

## 5. Access and Correction

### 5.1. ACCESS

Individuals may request access to personal information CHL holds about them. Where the individual's identity has been verified and if they are, is entitled to access, CHL will provide the requested personal information within a reasonable time frame. CHL may levy a charge against the individual to cover any administrative or other reasonably incurred costs of providing the information. However, CHL will not charge the individual for making the request or correcting any information.

To request access to personal information please contact: [privacy@chl.org.au](mailto:privacy@chl.org.au)

All requests will be acknowledged within 5 business days of receipt. In order to protect personal information, CHL will verify the individual's identity, and may require additional identification documentation to confirm an individual's identity prior to releasing the requested information to them. Where CHL approves the request, personal information will be provided to the individual within a reasonable time frame, considering the volume of the request and required administrative tasks.

In certain circumstances under the APPs, CHL is not required to give an individual access to the collected and stored information. For example, access may be denied if it would pose a threat to the life or health of an individual or threat to public health and safety, denying access is required by legislation, a court/tribunal order or if access would negatively impact an investigation or appropriate action.

If CHL refuses access, written notice will be given to the individual including the reasons for refusal (unless it would be unreasonable to do so), the appeal mechanisms and any other relevant matters. Alternatively, access may be given through a mutually agreed intermediary.

### 5.2. CORRECTION

CHL will take reasonable steps to ensure that the personal information that it collects, uses and disclosures is accurate, up-to-date, and complete. However, if CHL is satisfied that, the information is inaccurate, out-of-date, incomplete, irrelevant, or misleading, or the individual to whom the personal information relates requests CHL to correct the information, then CHL will take reasonable steps to correct the personal information.

CHL will respond to a correction request within a reasonable period. CHL will not charge the individual for making the request, for correcting the information or for associating the statement with the personal information.

If CHL refuses to correct the personal information as requested by the individual, CHL must provide written notice including the reasons for refusal (unless it would be unreasonable to do so), the appeal mechanisms and any other relevant matter.

## 6. Contact and Complaints Process

### 6.1. CONTACT

For general enquires about this Privacy Policy, requesting access to your personal information or privacy more generally, please email: [privacy@chl.org.au](mailto:privacy@chl.org.au).

### 6.2. COMPLAINTS PROCESS

Privacy complaints are to be managed and investigated by the Privacy Officer.

Written complaints can be emailed to [privacy@chl.org.au](mailto:privacy@chl.org.au) or posted to:

The Privacy Officer  
Community Housing Limited  
19-23 Prospect Street  
Box Hill, Vic, 3128

When making a complaint, the individual is asked to include their contact details and provide sufficient background information and include how they are impacted by the event.

All complaints will be acknowledged within 5 business days of receipt.

The Privacy Officer will investigate the event and complaint. This may include requesting more information, gathering documents, conducting interviews and obtaining legal advice. Where practicable, the Privacy Officer will provide the individual with a written outcome of their investigation.

Should the individual wish to report a complaint or if you feel that CHL has not addressed your concern in a satisfactory manner, they may wish to contact the Office of the Australian Information Commissioner (OAIC). For more information, please contact: <https://www.oaic.gov.au>.

## 7. Publication of Policy

CHL is committed to managing personal information in an open and transparent way.

CHL will provide this policy free of charge and in an appropriate format on its website accessible at [www.chl.org.au](http://www.chl.org.au).

You can also request a copy of this policy by emailing [privacy@chl.org.au](mailto:privacy@chl.org.au)

*Note the remainder of this policy (including this sentence) other than the copyright sentence includes technical information about CHL's internal policy review procedures and will be deleted from the version of this policy made available publicly and published on CHL's website.*

## 8. Related legislation, industry frameworks and standards, CHL policy and procedures

### 8.1. EXTERNAL LEGISLATION AND FRAMEWORKS

<a href="#">Australian Privacy Principles Guidelines</a>
Privacy Act 1988
Privacy Amendment (Enhancing Privacy Protection) Act 2012
National Community Housing Standards
State Privacy Acts and Regulations

### 8.2. CHL RELATED POLICIES AND PROCEDURES

Customer Feedback Policy, Complaints Procedure, and Indicative Timeframes
Appeals Policy and Procedure
Customer Information Management Procedure
Data Breach Notification Procedure
CHL Group Codes of Conduct

## 9. Monitoring and Review

This document should be reviewed and revised periodically and/or as required. Any future changes will be made publicly available. The period between reviews must not exceed three years. This document remains valid until such time that a new version is published.

### Review history

Document reference	Date and version	Reason for review	Review frequency	Owner	Approver
POLCORAUSNATPRI202305	May 2023, Version 5.0	Scheduled review	Every two years	Governance	Managing Director
POLCORAUSNATPRI202104	February 2021, Version 4.0	Scheduled review	Every two years	National Manager Operations	Managing Director
POLCORAUSNATPRI201803	May 2018, Version 3.0	Scheduled review	Every two years	National Manager Operations	Managing Director

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