



| PRIVACY POLICY                        |                  | Document #                      | Level: Tier 1                     |
|---------------------------------------|------------------|---------------------------------|-----------------------------------|
|                                       |                  | Prepared By:<br>GRC Manager     | Date Prepared:<br>30 January 2018 |
| Effective Date:<br>1 September 2018   | Revision #<br>V4 | Reviewed By:<br>PR&CM Committee | Date Reviewed:<br>6 August 2018   |
| Compliance:<br>Privacy Act 1988 (Cth) |                  |                                 |                                   |

### 1. Purpose

The Roman Catholic Church Trust Corporation of the Archdiocese of Hobart (ABN 24 097 986 470) (**the Archdiocese**) is committed to complying with its obligations under the *Privacy Act 1988 (Cth)* (**Privacy Act**), including the Australian Privacy Principles (**APPs**).

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

### Scope of Application

This policy applies to the Archdiocese and its agencies including: Archbishop's Office, Parishes, Church Office, CatholicCare Tasmania, Centacare Evolve Housing, Catholic Education Tasmania and the Catholic Development Fund.

This policy may also be used to apply to bodies or committees associated with any of the above agencies, established to progress initiatives under the auspices of the Archdiocese.

### 2. Policy

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

This policy is available on the Archdiocese's website at <http://Hobart.catholic.org.au>. You may request a copy of the policy by contacting the Privacy Officer in accordance with paragraph 13 of this policy.

Please read this policy carefully before you provide the Archdiocese with any personal information.

### 3. Types of personal information that the Archdiocese collects and holds

#### *Personal information*

The Archdiocese 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 Archdiocese accounts;
- d) balances of accounts held at the Archdiocese;
- e) tax file number;

- f) marital status; and
- g) any other information that the Archdiocese considers to be reasonably necessary.

#### *Sensitive information*

The Archdiocese may need to collect sensitive information about you. The Archdiocese will only collect sensitive information about you if:

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

The types of sensitive information that the Archdiocese collects and holds about you may include:

- a) information or an opinion about your race or ethnic origin, religious beliefs or affiliations, philosophical beliefs, membership of a profession or trade association, membership of a trade union, sexual orientation and/or practices;
- b) criminal records; or
- c) health information.

#### *Information required by law*

The Archdiocese may also collect personal information about you because the collection of the information is required or authorised by law or a court/tribunal order.

#### **4. Collecting your personal information**

The Archdiocese will, if it is reasonable and practical to do so, collect personal information directly from you.

The Archdiocese may collect your information when you:

- a) give the Archdiocese information over the telephone;
- b) interact with the Archdiocese electronically or in person;
- c) access its website; and
- d) complete application forms.

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

- a) schools;
- b) your relatives;
- c) the Archdiocese's service providers; and
- d) information that is publicly available on the electoral roll.

If you do not provide the Archdiocese 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.

#### *Unsolicited personal information*

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

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

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

## 5. Storing personal information

The Archdiocese stores your personal information in different ways, including paper and electronic form, via cloud and via Dropbox.

The Archdiocese treats all personal information as confidential. It will take reasonable steps to ensure personal information is protected from:

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

Some of the ways the Archdiocese does this are:

- a) confidentiality requirements for employees;
- b) document storage facilities;
- c) security measures for access to systems;
- d) only giving access to personal information to a person who is verified to be able to access that information;
- e) control of access to buildings; and
- f) electronic security systems, such as firewalls and data encryption, user identifiers, passwords or other access codes, antivirus, antispyware, backup and recovery of systems.

If the Archdiocese 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) the Archdiocese is required by law, or a court/tribunal order, to retain the information.

## 6. Purpose for collecting, holding, using and disclosing information

The Archdiocese collects, holds, uses and discloses your personal information for the following purposes:

- a) to assess your account application;
- b) to establish and administer your account;
- c) to verify your identity;
- d) to consider any other application made by you for products or services;
- e) for customer relations purposes, including managing the Archdiocese's relationship with you;
- f) to comply with any applicable laws, regulations or codes of practice;
- g) to comply with any payment systems requirements;
- h) for information technology systems development and testing where the Archdiocese's internal computer system is upgraded;
- i) for the Archdiocese's internal operations, including record keeping, risk management, auditing, training, file reviews and account analysis;
- j) to investigate, resolve and prevent complaints;
- k) to make arrangements with other organisations to provide services in relation to the Archdiocese's products and services (for example, the Archdiocese may arrange for mailing houses to distribute account statements);
- l) to conduct fraud assessments;
- m) for reporting and data analytics purposes, including for regulatory, management, statistical or research purposes;
- n) direct marketing purposes; and
- o) for any other purpose for which you have given your consent.

## **7. Use and disclosure of information**

Personal information the Archdiocese holds about you that was collected for a particular purpose will not be disclosed for another purpose, unless:

- a) you have consented to the use or disclosure of the information for another purpose; or
- b) the access, use or disclosure is otherwise permitted under the Privacy Act (e.g. you would reasonably expect the Archdiocese to use or disclose the information for another purpose or the use or disclosure of the information is required or authorised by law or a court/tribunal order).

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

- a) the Archdiocese's service providers;
- b) the Archdiocese's agents, contractors and external advisors (for example, Archdiocese's lawyers, auditors and Catholic Development Fund Tasmania);
- c) any person acting on your behalf, including your legal and financial advisers;
- d) Government and other regulatory bodies, law enforcement bodies and courts as required or authorised by law;
- e) external dispute resolution bodies;
- f) other financial institutions; and
- g) any other person where you have given your consent.

The Archdiocese is not likely to disclose your personal information to any overseas recipients.

Where your personal information is disclosed, the Archdiocese will seek to ensure that information is used, held and disclosed consistently with the Privacy Act and any other applicable laws.

## **8. Direct marketing**

The Archdiocese may use or disclose your personal information (excluding sensitive information) for direct marketing purposes. The Archdiocese may conduct direct marketing via email, telephone, mail out or any other electronic means.

The Archdiocese will only use your sensitive information for the purposes of direct marketing if you have consented to the information being used or disclosed for the purposes of direct marketing.

If at any time you decide you do not want to receive any more marketing material from the Archdiocese, you may:

- a) contact the Privacy Officer in accordance with paragraph 13 of this policy; or
- b) opt-out of receiving any more marketing material via any opt-out mechanism contained in the Archdiocese's marketing correspondence.

All the Archdiocese's marketing correspondence will display a clearly visible and user-friendly opt-out mechanism. The Archdiocese may imply consent to receive direct marketing material if you do not use the opt-out mechanism.

If you request to no longer receive direct marketing material the Archdiocese will process your request within a reasonable period after the request is made.

## **9. Quality of personal information**

The Archdiocese 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 the Archdiocese'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 13 of this policy.

## **10. 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 by contacting the Privacy Officer in accordance with paragraph 13 of this policy.

Depending on the nature of the request, the Archdiocese may charge you a small fee for granting you access.

The Archdiocese 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 the Archdiocese to give you access. If the Archdiocese refuses to give you access, it will:

- a) take reasonable steps to give you access in a manner that meets the Archdiocese'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.

## **11. Correcting personal information**

If you think that any personal information the Archdiocese holds about you is incorrect, inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request the Archdiocese to correct the information by contacting the Privacy Officer in accordance with paragraph 13 of this policy.

The Archdiocese 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 the Archdiocese corrects personal information that has been disclosed to another entity and you ask the Archdiocese to tell the other entity about the correction, the Archdiocese will take all reasonable steps to tell the other entity about the correction, unless it is impractical or unlawful to do so.

If the Archdiocese 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.

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

## **12. Anonymity**

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

## **13. Data Breach**

A Data Breach is an incident where personal or confidential information, or non-personal information that could be sensitive or commercial is compromised, disclosed, copied, transmitted, accessed, removed, destroyed, stolen or used by unauthorised individuals, whether accidentally or intentionally.

The Archdiocese of Hobart is obligated under the Australian *Privacy Amendment (Notifiable Data Breaches) Act 2017* to notify individuals whose personal information is involved in a data breach that could potentially result in serious harm.

## 14. Complaints or queries

If you:

- a) have any issues about the way the Archdiocese 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 Archdiocese Privacy Officer at:

Archdiocese Privacy Officer

Email: [privacyofficer@aohtas.org.au](mailto:privacyofficer@aohtas.org.au)  
Telephone: (03) 6208 6222  
Post: GPO Box 62, Hobart, Tas, 7001  
Visit: 35 Tower Road, New Town, Tas, 7008

If the Archdiocese'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 the Archdiocese'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)

## Related Documents

Workplace Behaviour Policy

## Changes to this policy

The Archdiocese will review this policy from time to time and updates are available on the website.

---

## Policy approved by:

Most Rev Julian Porteous, Archbishop of Hobart,  
11 August 2018