

OP8111 - Information Privacy Policy

Policy Owner	Executive Manager, People Culture and Safety
Policy Author	Business Information Manager
References to documents this policy relies upon or satisfies	<i>Information Privacy Act 2009</i> <i>Information Privacy Regulation 2009</i> <i>Right to Information Act 2009</i> <i>Right to Information Regulation 2009</i>
References to written direction that give effect to this Policy	OP8112 Right to Information Policy

1. Policy Statement

Unitywater (we, us, our) is a statutory authority established under the *South-East Queensland Water (Distribution and Retail) Act 2009 (Qld)*. We provide water and sewerage services to the Moreton Bay, Sunshine Coast and Noosa local authority areas.

We are committed to protecting the privacy of the Personal Information we collect and receive. Unitywater is committed to complying with the *Information Privacy Act 2009* and the Information Privacy Principles.

2. Purpose and Objectives

Unitywater respects the integrity of the Personal Information provided to us.

The purpose of this document is to advise you how Unitywater collects, uses and discloses Personal Information and complies with its obligations under the *Information Privacy Act* and the eleven Information Privacy Principles.

3. Policy Scope/Coverage

This Policy applies to any individuals in respect of whom Unitywater currently holds, or may in the future collect, Personal Information.

4. Consent

By providing us with Personal Information, you consent to us collecting, using and disclosing that information (within and outside Australia) in accordance with this Privacy Policy.

5. What Personal Information do we collect and why do we need it?

5.1 General

In addition to any other purposes set out in this Privacy Policy, we collect and use Personal Information to:

- a) process your inquiries;
- b) provide our products and services;

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- c) provide information about our products and services;
- d) comply with our regulatory, contractual, insurance, governance and other legal obligations;
- e) assess any application you make for a position with us and, if you are successful, for the purposes of your employment with us;
- f) process payments;
- g) protect and enforce our legal rights; and
- h) protect and defend the rights of our employees and customers.

5.2 What information do we collect?

The Personal Information we collect may include your name, address, email address, any medical information you provide to us, telephone numbers, details of the number of people in your household, whether you are entitled to a pensioner or other discount, residential status and credit card (including expiry dates) and bank details.

5.3 Job Applications

If you apply for a position with us, we will collect Personal Information from your application and resume and during any other parts of the recruitment process. This information will be used to consider your application for employment and to verify the information you provide (including contacting any referees).

If you are successful, the information you provide (including Personal Information) will form part of your employment records, along with other information we collect during the term of your employment.

5.4 CCTV and other imaging

For security purposes, we have CCTV cameras at our premises and your image may be recorded. By entering our premises, you consent to us recording your image.

6. How do we collect the Personal Information?

6.1 Generally

We aim to collect Personal Information directly from you. However, we may also collect Personal Information:

- a) from our Associated Third Parties;
- b) from debt collection agencies if you default in a payment to us;
- c) through our Website and any Social Networking Sites we utilise;
- d) from third parties;
- e) from publicly available sources of information; or
- f) when we are required to do so by law.

If at any time you supply Personal Information to us about any other person, you represent and we accept that information solely on the basis that you are authorised to do so and that the relevant person has consented to the disclosure to us.

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6.2 Cookies

A cookie is a message given to a web browser by a web server. The statistical information collected by cookies when you use our Website includes the:

- a) user's server address;
- b) top level domain, e.g. .com, .gov, org, .com.au;
- c) date and time of the user's visit;
- d) pages and documents accessed;
- e) type of browser used; and
- f) website visited before and after ours.

We also use cookies to track business processes if you transact business through our Website.

The information collected by cookies is generally anonymous. We do not use that information to try to identify users unless we are lawfully required to do so for investigation or law enforcement purposes.

6.3 Disclosing Personal Information

We may disclose your Personal Information to third parties in certain circumstances including:

- a) if you agree to the disclosure;
- b) where required for our operational purposes;
- c) for the primary purpose for which it was collected, e.g. to provide you with products or services or to facilitate the provision of those products or services to you;
- d) to our Associated Third Parties;
- e) to Moreton Bay and Sunshine Coast Regional Councils and with Noosa Shire Council in accordance with the Participation Agreement those Councils have entered into with Unitywater;
- f) to the Queensland Audit Office;
- g) where you would reasonably be expected to consent to information of that kind being passed to a third party;
- h) where disclosure is required or permitted by law, by court order or to investigate suspected fraud or other unlawful activity;
- i) to our Related Entities; or
- j) if disclosure will prevent or lessen a serious or imminent threat to someone's life or health.

If we disclose any Personal Information to an Associated Third Party, we will take reasonable steps to ensure the Associated Third Party is bound to deal with any Personal Information in accordance with section 35 of the Information Privacy Act.

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6.4 Marketing

We may use and disclose your Personal Information to provide you with information on offers, products and services offered us, our Related Entities or Associated Third Parties.

If at any time you no longer wish to receive any additional marketing or survey material from us or do not want your information disclosed for direct marketing or survey purposes, contact our Privacy Officer and we will remove your details from our marketing database.

7. Storing Personal Information and security

7.1 Storage

Depending upon the purposes for which we have collected the Personal Information, we retain it in our record management system, payroll system, financial management system and electronic databases.

We retain Personal Information in paper or electronic media in accordance with the *Public Records Act 2002* (Qld) and the general retention and disposal schedule issued by the Queensland State Archives. After that period we may, however, retain Personal Information for as long as is necessary to comply with any applicable law, for the prevention of fraud, for insurance and governance purposes, in our IT back-up, for the collection of any monies owed and to resolve disputes.

When the Personal Information we collect is no longer required, to the extent we can, we remove or de-identify the Personal Information.

7.2 Security

The steps we take to protect your Personal Information include electronic and physical security measures, information security policies and procedures, staff training and use of password protection software. Our employees are also bound by the *Public Sector Ethics Act 1994* (Qld) and the principles under that Act.

While we take active steps to protect Personal Information we hold from misuse, loss, unauthorised access, modification or disclosure, no system is completely secure against cyber attack. You should contact us immediately if you believe that someone has unlawfully gained access to your Personal Information or you consider that we have breached our privacy obligations to you in any way.

7.3 Third party websites

We are not responsible for the content, privacy or security practices or the content of any third party websites accessed from our Website. You must therefore read the third party's privacy policy and satisfy yourself as to the content and appropriateness of that policy.

8. How you can update, correct or delete your Personal Information

8.1 Updating or accessing Personal Information

If any of your Personal Information changes or you believe it is inaccurate, please provide us with the details so we can update our records.

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You may request access to your Personal Information by contacting our Privacy Officer. For security purposes we may ask you to provide us with evidence of your identify before we make any disclosure.

8.2 Exclusions

The Information Privacy Act and the *Right to Information Act 2009* (Qld) outline circumstances under which we may deny access to some or all of your Personal Information. In such cases, we will give reasons for our decision.

Access may be denied where Personal Information:

- a) relates to an investigation under the *Crime and Corruption Act 2001* (Qld);
- b) is contained in a public interest disclosure within the meaning of the *Whistleblowers Protection Act 1994* (Qld) or that has been collected in the course of an investigation arising out of a public interest disclosure;
- c) relates to situations where the authority to collect, use, store or disclose the Personal Information has an overriding statutory base; or
- d) is contained in generally-available publications such as annual reports, the Queensland Government Gazette, newspapers, newsletters, books or magazines.

9. Changes to our Privacy Policy

Periodically we may review this Privacy Policy and amend it to reflect changes in the law, advice from the Information Commissioner or to reflect changes in our procedures. Once amended, we will post the updated Privacy Policy on our Website.

You should review our Privacy Policy whenever you access our Website or provide us with Personal Information. Upon request, our Privacy Officer will also provide you with a copy of our Privacy Policy.

10. Contact information

You should contact our Privacy Officer if:

- a) you would like any further information on our Privacy Policy or our handling of Personal Information;
- b) you have a complaint;
- c) you have any concerns over the protection of the Personal Information you have given to us or that we have collected from others;
- d) you wish to apply for access to your Personal Information or to amend your Personal Information;
- e) you believe someone has gained access to your Personal Information; or
- f) we have breached our privacy obligations or your privacy rights in any way.

Our Privacy Officer's contact details are:

Administration Services Manager
PO Box 953, Caboolture

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Queensland 4510

If you do not consider that we have dealt with your request satisfactorily, you may make a privacy complaint to the Office of the Information Commissioner at:

Mail: PO Box 10143, Adelaide Street, Brisbane, Queensland 4001

Email: administration@oic.qld.gov.au

Telephone: (07) 3405 1111

11. Definitions

The meaning of any general language is not restricted by any accompanying example and the words 'includes', 'including', 'such as', 'for example' or similar words are not words of limitation.

Term	Meaning
Associated Third Parties	means individuals, companies and other entities with whom we work to provide products and services (for example, companies offering products related to our services, plumbers or other service providers).
Information Privacy Act	means the <i>Information Privacy Act 2009</i> (Qld).
IPP	means the Information Privacy Principles under Schedule 3 of the Information Privacy Act.
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 individuals whose identity is apparent, or can reasonably be ascertained, from the information or opinion' (section 12 <i>Information Privacy Act</i>).
Privacy Policy	means this document, as amended from time to time
Related Entities	has the same meaning as under the <i>Corporations Act 2001</i> (Cth).
Social Networking Site	means any social networking sites operated or utilised by us.
Website	means www.unitywater.com