

# Privacy Policy

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## 1. Policy Commitment

The AusHeritage Limited is committed to establishing and maintaining a framework for the collection, use and disclosure, security, access and updating of the Private Information it collects, uses and discloses, by complying with its obligations under the **Privacy Act 1988 (Cth)**. In addition, AusHeritage Limited is committed to establishing and maintaining a complaint handling process for investigating breaches of the **Australian Privacy Principles**.

## 2. Objectives of this Policy

- a) Comply with the objectives of the Privacy Act 1988 (Cth)
- b) Incorporate the Australian Privacy Principles into the way AusHeritage Limited works and interacts with others
- c) Identify the AusHeritage Limited's activities and functions giving rise to the legitimate collection of Private Information
- d) Ensure that AusHeritage Limited's partners and service providers who handle transferred or cross-border Private Information are subject to the Australian Privacy Principles (or substantially the same protections)
- e) Establish a training program to ensure that AusHeritage Limited's members are aware of their obligations
- f) Establish a process for AusHeritage Limited's to consider the impact on privacy of any new initiative
- g) Ensure the integrity of AusHeritage Limited's handling of personal and contractual information
- h) Establish a complaints handling service to investigate possible privacy breaches.

## 3. Scope

The Privacy Policy relates to AusHeritage Limited and gives rights to AusHeritage Limited members and anyone else whose Private Information is held by the AusHeritage Limited.

## 4. Specific Requirements

### 4.1 AusHeritage Limited complies with the Australian Privacy Principles

- a) AusHeritage Limited's has adopted the Australian Privacy Principles (Appendix 1) and continually work towards ensuring that its practices, procedures and systems comply with those principles
- b) AusHeritage Limited disseminates to its members the Australian Privacy Principles and its practices, processes and systems which support those principles
- c) AusHeritage Limited reviews its contractual arrangements with third parties who handle Private Information to ensure that those third parties are subject to the Australian Privacy Principles or, where the Private Information will be held outside Australia, substantially similar protections.

- d) AusHeritage Limited will consider the impact of any new initiative, process or system on the Australian Privacy Principles and the integrity of Private Information protection.
- e) We review our compliance with the Australian Privacy Principles, including our obligation to review this policy regularly

#### **4.2 Under the Corporations Act 2001 AusHeritage Limited collects, uses and discloses, holds and destroys Private Information related to its functions and activities.**

- a) AusHeritage Limited collects and maintains and discloses Private Information related to the following functions and activities:

- Recruitment
- Membership
- Directors
- Ticketing
- Marketing
- Events
- Company records – *ie. AusHeritage Limited is required to provide the Australian Securities & Investments Commission (ASIC) Private information regarding all Directors including full name, address and date of birth*

- a) We are open and transparent about the management of Private Information, and we have identified the type of Private Information we collect, how it's collected and how it's used and disclosed (Appendix 2 – Collection, Use & Disclosure of Personal Information Disclosure Document, which is updated from time to time). We take strict steps to protect Private and Company Information which we hold from misuse, interference, loss, unauthorised access, modification or disclosure and may hold Private Information in the following ways:

- Email (secured server/Company secretary)
- Hard drive (secured server/Company secretary)
- Physical files (physically secured/Company secretary and archive)

- d) We delete Private Information securely. We will periodically review Private Information that we hold. Where we no longer require such information for any purpose for which the information was collected, or information has been updated with new Private Information, we will take steps to immediately destroy or de-identify the old information.

#### **4.3 How do I access and update my Private Information?**

- a) Requests for access or updating may be made by the Company secretary or by any member and should be forwarded to the Company secretary using any of the following methods:

By email to the Company secretary – Penny Tripp [ptripp@unimelb.edu.au](mailto:ptripp@unimelb.edu.au)

#### **4.4 How can a complaint be made about a breach of the Australian Privacy Principles affecting Private Information?**

- a) Any member may contact the Chairman or Company secretary to discuss any concerns over AusHeritage Limited's handling of Private Information.

b) Alternatively, any member may lodge a complaint with the Company secretary, in writing.

#### 4.4.1 How will a complaint be handled?

The Company secretary will bring any complaints to the notice of the AusHeritage Limited Board in a timely manner and will list any complaint on the Agenda for discussion at the next Board meeting after receipt of any complaint:

- The Company secretary will acknowledge receipt of the complaint in writing
- The Company secretary may undertake an investigation or engage an appropriate investigator to prepare a report for the AusHeritage Limited Board meeting at which the complaint is scheduled to be discussed
- The report is to include an opinion as to whether the AusHeritage Limited has breached an Australian Privacy Principle
- The AusHeritage Limited Board will consider a remedy or action to be taken
- The Company secretary will communicate the decision of the AusHeritage Limited Board to the person making the complaint

## 5. Definitions

**Australian Privacy Principles** or APP means those principles set out in Schedule 1 of the Privacy Act, which are reproduced in Appendix 1.

**AusHeritage Limited** means **AusHeritage Ltd (ACN 071 155 701)**

**Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable: a) whether the information or opinion is true or not; and b) whether the information or opinion is recorded in a material form or not.

**Privacy Act** means the Privacy Act 1988 (Cth).

**Privacy Officer** means the person performing the role of Privacy Officer from time to time which would normally be the Company secretary. Private Information means Personal Information and Sensitive Information.

**Personal Information** means:

- (ii) Full name
- (iii) Date of birth
- (iv) Private address
- (v) Names of family members
- (vi) Names of employers. *Also refer to Article 8.12 (Associate of Auditor not to be Director) of the Constitution of AusHeritage Ltd. (Dated November, 2020)*

**Sensitive Information** means:

- a) information or an opinion about an individual's:
  - (i) racial or ethnic origin; or
  - (ii) political opinions or memberships of political organisations; or
  - (iv) religious beliefs or affiliations; or
  - (v) philosophical beliefs; or
  - (vi) memberships of a union; or
  - (vii) memberships of a professional or trade association; or
  - (viii) sexual orientation or practices; or
  - (ix) criminal record (that is also personal information); or
- b) health information about an individual.

**6. References**

Privacy Act 1988 (Cth)  
Privacy Amendment (Enhancing Privacy Protection) Act 2012  
Corporations Act 2001 (Cth)

## **Appendix 1 - Australian Privacy Principles**

<https://www.oaic.gov.au/privacy/australian-privacy-principles>

The Australian Privacy Principles are:

Australian Privacy Principle 1—open and transparent management of personal information

Australian Privacy Principle 2—anonymity and pseudonymity

Australian Privacy Principle 3—collection of solicited personal information

Australian Privacy Principle 4—dealing with unsolicited personal information

Australian Privacy Principle 5—notification of the collection of personal information

Australian Privacy Principle 6—use or disclosure of personal information

Australian Privacy Principle 7—direct marketing

Australian Privacy Principle 8—cross-border disclosure of personal information

Australian Privacy Principle 9—adoption, use or disclosure of government related identifiers

Australian Privacy Principle 10—quality of personal information

Australian Privacy Principle 11—security of personal information

Australian Privacy Principle 12—access to personal information

Australian Privacy Principle 13—correction of personal information

## Appendix 2 – Collection, Use & Disclosure of Personal Information Disclosure Document

Type of personal information collected	How the personal information is collected	Why the personal information is collected	How the personal information is used	How the personal information is disclosed (with consent where required)
<b>Recruitment</b>				
<b>Name, contact details, work history, references</b>	Recruitment records – resume, application letter	To determine the suitability for the role	To inform the interview panel and the interview process	May be disclosed to referees to enable references to be checked and verified. May be disclosed to internal stakeholders with a role in employment activities.
<b>Name, contact details, qualifications, occupation, position and work history, employers, business name and ABNs, professional services and products offered, names of referees,</b>	Application form, Curriculum vitae, referees letters.	Record keeping, assessment of applications,	To inform the AusHeritage Pty Ltd Board.	May be disclosed to referees to enable references to be verified. May be disclosed to internal stakeholders.
<b>Regulatory compliance – ASIC, ATO and other</b>				
<b>Director name, address, date of birth</b>	Company secretary or treasurer requests Directors to provide this information	Legal requirement	To inform regulatory compliance	May be disclosed to third parties who provide goods or services associated with regulatory compliance.  May be disclosed to enable regulatory compliance.
<b>AusHeritage membership</b>				
<b>Name, contact details, occupation, membership of other organisations</b>	Membership application forms	To facilitate membership	Invitations to events, voting rights, AGM notifications, may be used for direct marketing	May be disclosed to third parties who provide goods or services associated with membership.  Member list published on website and marketing materials.

<b>Payment credit card number and holder details.</b>	Member forms, online or hard copy, and payments made over the phone.	To facilitate membership payment	To facilitate payment.	Payment details securely disclosed to the bank using data encryption.  May be disclosed to Third parties who provide goods and services associated with membership and heritage.
<b>AusHeritage Marketing activity</b>				
<b>Photographs and reports of activities</b>	Photographers operating during events and missions. Rapporteurs to write up a summary of salient points	To analyse and promote the activities of AusHeritage Limited	May be used in promotional material	May be disclosed to third parties who provide goods or services associated with membership promotion, including printing, advertising and mail house organisations, and displayed on the internet.
<b>Data collection</b>	Forms, event registrations, cookies			May be added to the AusHeritage Website.
<b>Events</b>				
<b>Name, contact details</b>	Event booking registration	To assist in the facilitation of events, and for direct marketing purposes	To assist in the facilitation of events.  May be used for direct marketing	May be disclosed to third parties who provide goods or services associated with the delivery of events.
<b>Work Health and Safety</b>				
<b>Name, contact details, witness details, incident details including injury</b>	Incident report  COVIDsafe data collection for in-person meetings and events	To investigate the incident and determine root cause. To manage and control risks  To comply with government direction in COVIDsafe planning	May be used to manage WHS & Risk	May be disclosed to medical personnel and government or legal representatives

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