



Policy No: OP-012	PRIVACY POLICY
Purpose of Policy	This Privacy Policy helps You understand how Havelock Housing Limited (ABN 47 119 833 407), trading as Havelock Housing Association (Havelock), deals with your personal information. Personal information means any information or opinion about an individual who is reasonably identifiable.
Definitions	Embedded in document
Scope	Havelock is committed to respecting the privacy of individuals. This Privacy Policy sets out how we manage your personal information, and its implementation is one measure we take to ensure our processes are open and transparent as required by the <i>Privacy Act 1988</i> (the Act). Any person who provides personal information to us consents to us using, storing, and disclosing that personal information in accordance with this Privacy Policy.
Related Policies	OP-011 Privacy Policy for Employees
Related Procedures	Nil
Policy Steward	Chief Executive Officer
Regulatory Standard and Legislation	Performance Outcome 6 - Management

1. Introduction

- 1.1 Havelock Housing Limited (HHL) takes its obligations under the Privacy Act 1988 (the Privacy Act) and the Australian Privacy Principles (APPs) very seriously. This Privacy Policy sets out how personal information is collected, held, used and disclosed for the purpose of carrying out HHL activities and functions, as described in clause 2.1, and in accordance with the Act, the Australian Privacy Principles and any other relevant legislations including:
- a) the Spam Act 2003 (Cth); and
 - b) the Do Not Call Register Act 2006 (Cth).
- 1.2 This Privacy Policy is available on the HHL website at www.havelockhousing.com.au. Any member of the public can contact HHL directly to request a free copy.
- 1.3 This Privacy Policy may be revised or updated from time to time by publishing a revised version on the HHL website and the employee intranet. Revised versions take effect from the time published with or without notice to you.

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2. Why does Havelock collect personal information?

- 2.1 Personal information is collected as required to enable HHL to efficiently carry out its core business activities and functions, and provide various products, services, and offerings. This includes:
- c) verifying the identity of an individual;
 - d) completing background checks;
 - e) verifying an individual's compliance with any HHL policies, rules, and regulations, as applicable from time to time;
 - f) organising, controlling, and administering HHL programs, activities and other events, including sending invitations to events;
 - g) administering, managing and providing access to the HHL website or any other registration database used by HHL;
 - h) researching, developing, running, administering and marketing programs, activities and events relating to HHL;
 - i) assisting in community activities;
 - j) supporting professional advisory groups, HHL boards and committees, and other employee groups;
 - k) facilitating discussion of topical issues relating to community housing;
 - l) providing information, education, training, and technical support to employees;
 - m) providing advocacy services on behalf of employees;
 - n) administration of grant programs;
 - o) conducting market research and surveys to improve services, and analyse trends;
 - p) receiving, investigating, and taking action on complaints employees;
 - q) complying with corporate governance obligations;
 - r) communicating with the individual during the provision of services;
 - s) communicating with stakeholders, partners, donors, and supporters;
 - t) processing payments and arranging deliveries from suppliers;
 - u) tailoring offerings to employees' needs and preferences; and
 - v) other related activities from time to time
- 2.2 HHL only collects the personal information required to perform its activities and functions.
- 2.3 HHL takes reasonable steps to ensure that personal information that HHL collects is accurate, up to date, and complete.

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3. What personal information does Havelock collect?

- 3.1 Personal information is defined in section 6(1) of the Privacy Act as information or an opinion about an identified individual or an individual who is reasonably identifiable.
- 3.2 Personal information HHL collects may include name, address, email address, phone number, date of birth, country of origin, proof of identity, mailing address, emergency contact details, education, government benefits/services, family history, communication preferences, communication history, gender, and bank statements. HHL may also collect sensitive information as described in clause 4.1 below.
- 3.3 HHL may collect personal information through HHL's website, including when an individual becomes a tenant, completes an online housing application form, registers for an event, subscribes to a newsletter list, contacts HHL about a service, or sets up an account with HHL.
- 3.4 HHL may also collect the following information through HHL's website, either directly or indirectly through a third party such as Google Analytics or other computer data analytics platform:
- a) A computer or device's IP address (collected and stored in an anonymised format);
 - b) device screen size;
 - c) device type, operating system and browser information;
 - d) geographic location (country only);
 - e) referring domain and out link if applicable;
 - f) search terms and pages visited (clickstream data); and
 - g) date and time when website pages were accessed.
- 3.5 The HHL website may also transfer cookies on computers and devices that access the website for record-keeping purposes. An individual may be able to change their browser preferences to reject all cookies before accessing the HHL website.
- 3.6 HHL will treat any personal information collected through the HHL website in the same way as other personal information we collect.

4. Sensitive information

- 4.1 HHL may collect sensitive information defined in section 6(1) of the Privacy Act, including information about an individual's health, medical history, dietary and mobility needs, copies of medical reports and psychiatric assessments in the course of conducting professional investigations, information or an opinion about the individual's nationality, racial or ethnic origin, association, memberships or criminal record or biometric information.

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- 4.2 HHL will only collect sensitive information about an individual if:
- a) the individual consents to HHL's collection of the sensitive information, and the sensitive information is reasonably necessary for HHL to carry out one or more of the organisations activities and functions; or
 - b) the collection is required or authorised by or under an Australian law or a court/tribunal order; or
 - c) HHL are otherwise permitted or authorised by the Act or an Australian law.
- 4.3 Sensitive information is collected for the purpose of ensuring the individual's health and safety, for insurance purposes and any other reason HHL considers appropriate for the purpose of conducting its activities and functions.
- 4.4 HHL may collect and use health information provided by the individual to ensure that HHL programs are run safely and in accordance with any special health needs of participants. In addition, HHL may use de-identified health information and other sensitive information to carry out research, to prepare submissions to government, or to plan future HHL competitions, events and activities.
- 4.5 Where possible, HHL destroys sensitive information after it is no longer required by the organisation or under the Act.

5. How is personal information collected?

- 5.1 HHL may collect personal information directly from individuals through various means including via the HHL website, in person, email, online, and written forms, phone calls, writing, recording, or other forms of correspondence.
- 5.2 HHL collects and holds personal information from the following individuals:
- a) Employees;
 - b) tenants and their family members;
 - c) attendees of HHL events;
 - d) members of the public who have contacted or communicated with HHL;
 - e) newsletter subscribers;
 - f) suppliers;
 - g) prospective employees;
 - h) donors; and
 - i) other individuals from time to time.
- 5.3 HHL may collect personal information when, the individual:
- a) enters their personal information into, or agree to having their personal information entered into, one of HHL's online systems;

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- b) applies or registers for HHL's services;
- c) subscribes to any HHL mailing list;
- d) accesses the HHL website;
- e) registers for newsletters, or any other HHL publication, including electronic publications;
- f) provides details to HHL in a questionnaire, application, consent form, survey, feedback form or incident report form;
- g) supplies HHL with goods or services;
- h) applies for a job with HHL or are employed by HHL;
- i) contacts HHL for information on its products or services;
- j) makes a complaint to HHL, or obtains a refund or credit;
- k) contacts us through the HHL website or by another means;
- l) obtains products, services, or information from HHL or an authorised agent or licensee;
- m) becomes involved on a HHL board or committee;
- n) registers to attend a HHL event;
- o) donates to HHL;
- p) becomes an industry expert or media contact of HHL's;
- q) attends HHL premises; and
- r) otherwise correspond with HHL by various means.

5.4 HHL may also collect individuals' opinions, comments, and other data through surveys it conducts, which are generally hosted through third party providers.

6. Collection from third parties

- 6.1 From time to time, HHL may obtain personal information from third parties not disclosed in this Privacy Policy. When this happens, HHL will take reasonable steps to ensure that it makes the individual aware of the collection of their personal information in accordance with the Act.
- 6.2 HHL will only collect personal information indirectly from third parties if it is not reasonable or not practicable to collect the personal information directly from the individual, or where the individual has otherwise consented to the personal information being provided to HHL through that third party.
- 6.3 Personal information may also be collected from third parties where HHL is required or permitted to do so by law.
- 6.4 HHL may collect personal information from the following third parties:
 - a) a HHL affiliate that assists in running programs, events, or activities;
 - b) direct marketing database providers;

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- c) ACT Government directorates;
- d) Australian Government agencies such as the Australian Taxation Office.
- 6.5 HHL may also collect personal information from an individuals' legal guardian or authorised representative, if an individual has nominated to use one.
- 6.6 HHL may also collect personal information from publicly available sources to enable HHL to contact stakeholders who may be interested in HHL products or services.
- 6.7 Where HHL receive personal information about an individual from a third party which was not solicited, then that personal information will be dealt with in accordance with this Privacy Policy and the Act. HHL will determine, within a reasonable period, after receiving the personal information, whether it could have collected the personal information lawfully and fairly if it had solicited the personal information and only retain such personal information if HHL believes this is the case.
- 6.8 HHL may keep records of unsolicited personal information if the Act permits it (for example, if the personal information is reasonably necessary for one or more of HHL's activities and functions). If not, HHL policy will destroy or de-identify the personal information as soon as practicable, provided it is lawful and reasonable to do so.

7. Use of personal information

- 7.1 HHL will make the individual aware at the time of collection of their personal information how HHL intends to use that personal information.
- 7.2 HHL will use and disclose an individual's personal information for the purposes advised to them at the time of collection. HHL may also use and disclose personal information to enable HHL to perform and undertake its activities and functions, e.g., to refer a tenant to a community organisation who may assist the individual.
- 7.3 HHL may use or disclose personal information for a secondary purpose, where:
 - a) an individual would reasonably expect HHL to use or disclose the personal information, that is not sensitive information, and such secondary use is related to the primary purpose for which it was collected; or
 - b) an individual has consented to HHL's use and disclosure of their personal information; or
 - c) the use or disclosure is permitted or authorised by the Act, or any other Australian law or court/tribunal order.
- 7.4 HHL does not sell personal information to third parties, but it may disclose personal information to third parties from time to time, to facilitate and administer HHL's activities and functions

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8. Disclosure of personal information

8.1 HHL does not disclose personal information to other organisations unless:

- a) it is reasonably necessary to conduct HHL's activities and functions; or
- b) an individual gives their consent; or
- c) it is required or authorised by law including in emergency situations or to assist law enforcement, in which case the disclosure will be conducted in accordance with the Act and relevant law, including that HHL will make a written note of the use or disclosure.

8.2 HHL may disclose an individual's personal information, that is not sensitive information, to:

- a) manage and administer the services HHL provides;
- b) enable third parties engaged by HHL to provide services on their behalf, for example to conduct property maintenance;
- c) assist with enquiries;
- d) charge for amounts owed to HHL, including any debt recovery actions;
- e) ensure that HHL internal business operations are running smoothly including any reporting or legal requirements that may be required to fulfil; and
- f) otherwise, to conduct HHL's activities and functions.

8.3 HHL may disclose personal information to third parties who are contracted by HHL to carry out advisory, administrative, analytical or technical functions for the organisation. Where this happens, HHL will require those third parties to comply with the Privacy Act, the Australian Privacy Principles and this Privacy Policy. These third parties may include:

- a) financial institutions for payment processing;
- b) state and federal government and regulatory bodies;
- c) referees whose details are provided to us by job applicants;
- d) third parties who have complained about employees (including to advise them of the conduct and outcome of the complaint);
- e) Contracted service providers, including:
 - i. electronic content delivery providers;
 - ii. information technology service providers;
 - iii. publishers of HHL newsletters;
 - iv. marketing and communications agencies;
 - v. mailing houses, freight and courier services;
 - vi. printers and distributors of direct marketing material;
 - vii. external business advisers (such as accountants, auditors and lawyers); and
 - viii. transcript recording service providers, in relation to disciplinary proceedings.

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- 8.4 If HHL discloses personal information to overseas parties, the organisation will take reasonable steps to ensure that any overseas recipient does not breach the Australian Privacy Principles in relation to the personal information and otherwise complies with Australian Privacy Principles.

9. Security and storage of personal information

- 9.1 HHL takes reasonable steps to protect the personal information held from misuse, interference, loss, unauthorised access, modification, or disclosure.
- 9.2 Information may be securely stored in hard copy or electronic format in facilities that HHL owns and operates, or that are owned and operated by the organisation's service providers.
- 9.3 If HHL engages service providers or third parties to perform services for the organisation, HHL will ensure they comply with this Privacy Policy, the APPs and the Act.
- 9.4 HHL employees, contractors, and third party service providers are required to ensure that personal information they are privy to is not disclosed, except under appropriate circumstances. Service providers are required to ensure that any such personal information available to them is protected from theft, damage, loss, unauthorised access and any other form of abuse or improper use.
- 9.5 HHL's electronic databases are secured by firewall and anti-virus software to ensure, so far as practicable, that they are not accessible by unauthorised parties. HHL's website has security measures designed to protect against loss, misuse, or alteration to any personal information under HHL's control.
- 9.6 HHL uses EFTPOS and online technologies to process payments to ensure that all transactions meet industry security standards to ensure payment details are protected. Any payment information stored by HHL is encrypted, masked, and de-identified.
- 9.7 HHL conducts regular internal and external audits to assess the suitability of its security measures.
- 9.8 Physical access points to HHL's server are protected by locks, alarms, and surveillance cameras.
- 9.9 Once HHL no longer has a need for an individual's personal information, HHL will destroy the personal information when it is reasonably practicable to do so.
- 9.10 If an individual wishes to have their personal information removed from HHL's database, HHL will take reasonable steps to comply with their request unless HHL needs to keep the information for legal, auditing or internal risk management reasons.

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10. Access or correct your personal information

- 10.1 Under the Australian Privacy Principles, individuals have a right to access or correct their personal information held by HHL, unless a permitted exception exists at law.
- 10.2 HHL will respond to any request, within five business days, and in a way that is reasonable in the circumstances, unless exempted by the Act.
- 10.3 HHL may refuse to provide an individual with access to their personal information, or to provide access in the manner they have requested in circumstances where an exception to access applies under APP 12.
- 10.4 If HHL have disclosed an individual's personal information to a third party who is also subject to the Act, they will only inform that third party of the corrected details if the individual requests HHL to. HHL will take reasonable steps to do so at no cost, unless this would be unreasonable, impracticable, or unlawful.
- 10.5 If HHL refuses to provide an individual access to or correct their personal information, HHL will provide that individual with written notice setting out its reasons (other than to the extent it would be unreasonable to do so) and inform the individual of the mechanisms available to complain about the refusal.
- 10.6 If the individual requests HHL to do so, HHL will associate with their personal information a statement that the individual believes the personal information is incorrect and the reason why.
- 10.7 If HHL refuses to correct the individual's personal information, they may request that HHL make a record of the claim that the personal information is inaccurate, out-of-date, incomplete, irrelevant, or misleading. HHL will take reasonable steps to associate the record in such a way that will make it apparent to users of the personal information.
- 10.8 If an individual would like to access their personal information that HHL hold, the individual is to make a request directly to HHL using the contact details provided in clause 18 of this Privacy Policy. HHL will provide an individual with access to their personal information, within five business days, and in a way that is reasonable in the circumstances, unless exempted by the Act.
- 10.9 HHL may charge a reasonable fee for providing an individual with access to their personal information, which will be confirmed at the relevant time.

11. Social media and networking

- 11.1 HHL uses social media networks, such as Facebook, LinkedIn, Instagram, YouTube and X, to communicate with the public. When an individual engages with HHL's social media

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platforms, HHL may collect that individual's personal information, for the purpose of using it to communicate with that individual and the public.

- 11.2 The social media webpages may also collect, use and hold an individual's personal information, for its own purpose. It is recommended individuals consider the Privacy Policies of these social media websites prior to using the same.

12. Complaints

- 12.1 Any issues or complaints in relation to the collection, use, disclosure, quality, security of, access to and correction of an individual's personal information, including alleged breaches of this Policy, the Privacy Act or the Australian Privacy Principles should be made to HHL directly, via the contact details provided in clause 13 of this Privacy Policy.
- 12.2 HHL will respond to any complaint within a reasonable period, and in the first instance HHL's Privacy Officer will endeavour to take any steps necessary to resolve the matter within five business days.
- 12.3 HHL may ask the individual to complete a Privacy Complaint Form located at Annexure A to this Policy to assist in managing and resolving the complaint.
- 12.4 HHL will endeavour to acknowledge receipt of the Privacy Complaint Form within five business days of receiving it, and to complete an investigation into the complaint in a timely manner.
- 12.5 HHL's response to the Privacy Complaint Form will set out:
- a) whether in the Privacy Officer's view there has been a breach of this Privacy Policy or any applicable privacy legislation; and
 - b) what action, if any, HHL, will take to rectify the situation.
- 12.6 If HHL is unable to resolve the complaint or the individual is unhappy with the outcome, the individual may lodge a complaint with the relevant regulator, such as the Office of Australian Information Commissioner via its enquiries line on 1300 363 992, or via its website at <http://www.oaic.gov.au>.

13. Contact details

- 13.1 If an individual would like to request access to or amend their personal information, would like to make a complaint regarding HHL's conduct in relation to their personal information, or have any general enquiries in relation to their personal information, the following contact details are to be used:

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Havelock House, 85 Northbourne Avenue, Turner, ACT, 2612

Telephone: (02) 6257 2277

Email: info@havelock.org.au

14. Evaluation

- 14.1 As part of a continuous improvement system this Policy shall be reviewed annually and as required.

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