

INFORMATION PRIVACY

EFFECTIVE DATE : 23rd October 2007

RESPONSIBLE OFFICER : Managing Director

PURPOSE

To ensure that all information held by Central Highlands Water is only used and disclosed for the purposes under which it was collected.

DEFINITIONS

- **Personal Information:** information or opinion that is recorded in any form (including information or an opinion forming part of a database) and whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from that information or opinion
- **Information Privacy:** a group of related rights concerning an individual's control over the collection, use, release and disposal of their personal information

POLICY SUMMARY/SCOPE

Central Highlands Water is committed to protecting information consistently with the principles set out in the Victorian Information Privacy Act 2000.

Central Highlands Water will collect, manage, use and disclose personal information in accordance with this Act and with Central Highlands Water's Information Privacy Code of Practice.

This policy ensures the responsible and transparent handling of personal information. It provides for a clear, mutual understanding of rights and responsibilities in relation to information privacy.

POLICY BODY

Collection

Central Highlands Water only collects personal information that is necessary to perform our functions or if it is necessary by law.

The types of personal information that may be held by Central Highlands Water includes, without limitation:

- name, address and contact details;
- date of birth;
- Driver's Licence details;
- pension card numbers;
- bank account details;
- credit information; and
- health information.

We may also be required to collect some personal information as required by occupational health and safety laws.

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Central Highlands Water collects personal information in a number of ways including, without limitation:

- over the counter;
- using forms;
- telephone; and
- Internet.

If information is not supplied to Central Highlands Water that is requested then we may not supply the services or products that are requested.

Use and Disclosure

Central Highlands Water recognises that any personal information is very important to our customers, and our customers should have a right to control the use and dissemination of that information.

Central Highlands Water may use personal information for the purpose of providing water and sewerage related services and products, promoting such services and products and market research. Central Highlands Water may disclose personal information to our contractors and other third parties under the Privacy Act for these purposes.

Central Highlands Water may disclose personal information for the purpose specified at the time of collection or for another purpose if:

- it would reasonably be expected for Central Highlands Water to disclose it for that purpose; and
- the purpose is related to the purpose specified to the customer at the time of collection.

If Central Highlands Water wish to disclose any of the personal information collected other than as set out above, we will not do so unless we have the customer's express consent.

Exceptions to this include:

- where there are reasonable grounds to believe that disclosure is necessary to prevent a threat to life or health; or
- where Central Highlands Water suspects unlawful activity or has been engaged in and uses the personal information to investigate the suspected unlawful activity; or
- the use or disclosure is authorised or required by law or reasonably necessary to enforce the law.

Security

Central Highlands Water will take reasonable steps to ensure that all information that is collected, used or disclosed is accurate, complete, up-to-date and stored in a secure environment accessed only by authorised personnel.

Access and correction of personal information

Central Highlands Water customers have the right to access the personal information that is held by Central Highlands Water. If a copy of personal information is requested from Central Highlands Water there may be a charge to cover the administrative costs of providing the information.

If a customer requests access to their personal information and it is refused, Central Highlands Water will provide the reason/s for the decision. The circumstances in which access to personal information may be limited or denied include:

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- where access to the information would pose a serious threat to life or health of any individual or pose an unreasonable impact on the privacy of an individual;
- where access would prejudice any negotiation or legal proceedings between Central Highlands Water and the customer;
- where access would prejudice the detection of an investigation of unlawful activity; or
- where access would prejudice enforcement laws.

If Central Highlands Water are notified that the information that we have is not accurate, complete or up-to-date then we will take action to correct the information.

Compliance with the National Privacy Principles

In summary the policy is based on ten principles as stated in the Victorian Information Privacy Act 2000. Central Highlands Water will ensure:

1. The **collection** of information is for Central Highlands Water's purposes only.
2. That the **use and disclose** of information is for the primary purpose of its collection only.
3. **Data quality** (i.e. that information is accurate, complete and up-to-date).
4. **Data security** – that personal information is protected at all times.
5. **Openness** of information (not personal information) to anyone who asks for it.
6. **Access** is available to the owner of the personal information to review and correct any information held by the Authority that is not accurate.
7. **Unique identifiers** are only used where necessary.
8. **Anonymity** of individuals when entering transactions with Central Highlands Water.
9. **Transborder data flows** of personal information from Central Highlands Water outside Victoria is protected.
10. **Sensitive information** is only to be collected if it is required by law, is necessary to prevent injury or is consented to by the individual.

Central Highlands Water acknowledges its obligations to adhere to the 10 principles and will take all reasonable steps to comply, including the development of the Central Highlands Water Information Privacy Code of Practice.

The privacy of personal information is protected by legislation; therefore Central Highlands Water will be accountable under law if this commitment is not demonstrated in practice.

(END POLICY)

Approved by Board: 23 October 2007