

# Privacy Policy

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## 1. Policy Statement

This Privacy Policy serves as the standard for Service and Creative Skills Australia (SaCSA) and its representatives in meeting obligations and commitments relating to managing personal information. It delineates ongoing responsibilities, reinforcing our dedication to safeguarding and responsible management for the privacy of all individuals.

## 2. Scope

This policy applies to the collection, use, disclosure, storage, and disposal of personal information by SaCSA. It applies to all stakeholders, including clients, Team Members, and website users, outlining the principles and procedures employed to ensure the confidentiality and security of personal information.

This policy references the foundations of the Australian Privacy Principles (APPs) in the *Privacy Act 1988* (Cth) (the Privacy Act). The APPs govern the way in which SaCSA collect, use, disclose, store, secure and dispose personal information.

## 3. Personal Information Collection

### 3.1 Definition of Personal Information

This includes, but is not limited to, personal information, integral to individual identification, and encompasses details such as names, addresses, email addresses, and contact numbers.

### 3.2 Diverse Collection Usage

Methods of collecting information may include, but is not limited to, interviews, correspondence, telephone, email, and website interactions, to obtain this personal information. Third-party entities also contribute to our data sourcing.

### 3.3 Purposeful Collection Channels

Personal information is collected to ensure SaCSA can achieve our primary goal of delivering exceptional services. Additionally, we may leverage this data for secondary purposes closely aligned with the primary objective. Stakeholders retain the right to unsubscribe from our mailing / marketing lists at any time through written communication.

### 3.4 Lawful and Transparent Use and Disclosure

SaCSA is committed to the lawful and necessary collection, holding, usage, and disclosure of personal information to ensure compliance with legislation and regulations.

All personal information is employed and disclosed for the primary use purposes for which it is collected, strictly adhering to the Privacy Act guidelines. Any secondary purposes for the use of personal information will only be done so in accordance with the Privacy Act.

## 4. Passive Collection

### 4.1 Collection Channels

Stakeholders' information, encompassing personal details, undergoes collection through an array of software applications, services, and platforms utilised by both stakeholders' devices and SaCSA to support service delivery.

### 4.2 Passive Information Collection Intent

Information which is not collected directly and does not directly relate to the SaCSA's provision of services ("passive information"<sup>1</sup>) may be collected. Stakeholders consent for their information to be collected and shared in this way is typically obtained at the time they first use an application or service on their device.

### 4.3 Stakeholder Control of Passive Information

Individuals can exercise control over some passive data collections. Opt-out options include:

- disabling or refusing cookies;
- deactivating JavaScript;
- opting out of Google Analytics; and
- turning off location services on electronic devices.

This ensures that stakeholders can manage and tailor their information-sharing preferences.

## 5. Handling Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion(s) about such things as an Individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will only be used by SaCSA:

- for the primary purpose for which it was obtained;
- for a secondary purpose that is directly related to the primary purpose;
- with consent; or
- where required or authorised by law.

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<sup>1</sup> Examples of passive information may include but are not limited to website cookies (track browsing history, preferences and other site-related information), IP addresses which can identify location and network of users, and geolocation data (typically when on mobile devices). This information is generally picked up unintentionally and websites give the options to hide (for example deny cookies when browsing a page), however at times it may be used to understand where users are searching from (for example specific areas of Australia).

## 6. Third Parties

Where reasonable and practicable, SaCSA will collect personal information from the stakeholder. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that the stakeholder is made aware of the information provided to us by the third party.

## 7. Disclosure of Personal Information

Stakeholder personal information may only be disclosed:

- to third parties where individuals consent to the use or disclosure of their personal information; or
- where required or authorised by law.

## 8. Security and Access of Personal Information

### 8.1 Stakeholder Control of Passive Information

Stakeholder personal information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

When stakeholder personal information is no longer needed for the purpose for which it was obtained, SaCSA will take reasonable steps to destroy or permanently de-identify personal information. However, most of the personal information stored in client files may be kept by SaCSA for a minimum of seven (7) years.

### 8.2 Stakeholder Control of Personal Information

Stakeholders may access, update and/or correct the personal information we hold about them. If stakeholders wish to access their personal information, they will contact SaCSA in writing.

SaCSA will not charge any fee for the access request but may charge an administrative fee for providing a copy of personal information.

In order to protect stakeholder personal information, we may require identification from the stakeholder before releasing the requested information.

## 9. Maintaining Quality of Personal Information

It is important that personal information is up to date for all stakeholders of SaCSA. We will take reasonable steps to make sure that personal information is accurate, complete and up to date. If stakeholders find that the information we have is not up to date or is inaccurate, they are requested to advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services.

## 10. Breach of Policy

Non-compliance with this policy will be viewed as a serious matter. Where an actual or suspected breach of the policy occurs, SaCSA may take disciplinary action up to and including termination of employment or services.

## 11. Version Control

<b>Version</b>	2
<b>Owner:</b>	Director, Operations
<b>Approved By:</b>	CEO
<b>Approved Date:</b>	26 January 2024