



## Privacy Policy

## 1. POLICY STATEMENT AND PURPOSE

Gippsland Water is committed to the aims and objectives of the *Privacy and Data Protection Act 2014* (the Act). It is committed to ensuring personal information held by the corporation is protected and only used in accordance with this policy, or for a purpose authorised by the individual.

Gippsland Water believes that the responsible handling of personal information is a key aspect of corporate governance, and as such is strongly committed to protecting an individual's right to privacy.

This policy applies to all Board Members, Employees and third party Contractors of Gippsland Water.

## 2. OBJECT OF THE ACT

Gippsland Water is committed to fully meeting its obligations under the ten (10) Information Privacy Principles of the *Privacy and Data Protection Act 2014* and this policy:

- establishes a regime for the responsible collection and handling of personal information;
- to provide individuals with rights of access to information about them held by Gippsland Water, including information held by contracted service providers;
- to provide individuals with the right to correct information about them held by the Gippsland Water, including information held by contracted service providers;

## 3. KEY CONCEPTS AND DEFINITIONS

### Contracted service provider

A reference to a contracted service provider is a reference to a person or body in the capacity of contracted service provider and includes a reference to a subcontractor of the contracted service provider (or of another such subcontractor) for the purposes (whether direct or indirect) of the contract.

### Location of Personal Information

Gippsland Water holds personal information if the information is contained in a document that is in the possession or under the control of Gippsland Water, whether alone or jointly with other persons or bodies, irrespective of where the document is situated, whether in or outside Victoria.

### Personal Information

Personal information is any information or opinion about an identifiable person. This could include:

- written records about a person
- a photograph or image of a person
- fingerprints or DNA samples that identify a person
- information about a person that is not written down, but which is in the possession or control of Gippsland Water.

There are some exemptions from the definition of personal information. For example:

- personal information does not include information about a person who has been dead for 30 or more years
- personal information does not include various classes of information used for specific purposes or in specific contexts

#### 4. CONTACT PERSONS WITHIN GIPPSLAND WATER

The Manager Commercial Services is Gippsland Water's nominated Privacy Officer:

Privacy Officer:  
Lynley Keene  
Manager Commercial Services  
03 51774735  
[privacy@gippswater.com.au](mailto:privacy@gippswater.com.au)

#### 5. RELEVANT ACTS

*Privacy and Data Protection Act 2014*  
*Freedom of Information Act 1982*  
*Surveillance Devices Act 1999*  
*Charter of Human Rights and Responsibilities Act 2006*

#### 6. APPLICATION/PROCESS

##### 6.1. PERSONAL INFORMATION

Gippsland Water may hold information that may relate to an individual, an individual's financial situation / circumstances, and an individual's account with Gippsland Water.

In some limited circumstances, Gippsland Water may collect personal information such as health information for customers who use dialysis machines. Gippsland Water will collect this information only with the customers consent, or otherwise in accordance with any applicable law or regulation.

With regards to the personal information of customers, Gippsland Water collects and stores personal information within its Customer Information & Billing System (CIBS), within TRIM (Gippsland Water's Electronic Document Management System), and in Hard Copy Records. TRIM incorporates the requirements of the Public Records Office of Victoria (PROV) in relation to the standard for the general disposal of all records. Personal information is kept for the period stipulated by the PROV, with all customer information within CIBS being kept permanently.

##### 6.2. COLLECTION

Gippsland Water only collects information from its customers that the Corporation needs to conduct the business of providing water, wastewater and associated services within its region. The information Gippsland Water collects is the minimum required to ensure that it is able to provide a high level of service to its customers. Gippsland Water does not collect any information from a customer that is not required to ensure the provision of its services.

If it is reasonable and practicable to do so, Gippsland Water will collect personal information directly from the individual customer. When doing so, Gippsland Water will inform individuals of the matters set out in the Act, including the purpose/s for which the information is collected, and will use lawful and fair means. All forms that collect personal information will include a notification similar to the following:

*"The information Gippsland Water collects will only be used or disclosed for the purpose for which the information was collected, or if you have provided your consent, for another use".*

### 6.3. USE AND DISCLOSURE

Gippsland Water will only use personal information within Gippsland Water, or disclose it outside the organisation for the purpose for which it was collected or in accordance with the Act (e.g. where the individual has consented or where the individual would reasonably expect this to occur).

In the provision of services to its customers, Gippsland Water may need to disclose an individual's personal information to certain third parties including, without limitation, Police, State Revenue Office, Department of Immigration & Citizenship, the responsible Minister, and the Environment Protection Authority. From time to time and in a limited number of circumstances, Gippsland Water may obtain credit reports about a customer from a business that provides commercial credit worthiness services.

Should a customer owe monies to Gippsland Water, and procedures detailed in Gippsland Water's credit management statement and policy are followed without an agreed outcome, the corporation may provide information relating to the customer and the monies owed to a debt collection agency and a credit reporting agency.

Where information is released by Gippsland Water to such third parties, Gippsland Water will ensure that a record of the information released is contained within CIBS.

### 6.4. SECURITY

Gippsland Water will endeavour to maintain a secure system for storing personal information. Technological and operational policies and procedures are in place to protect personal information from misuse and loss and from unauthorised modification or disclosure; including access to Gippsland Water's website. For matters concerning website security, the Manager Information Communication and Technology should be contacted (Tel 03 5177 4600). Gippsland Water will dispose of personal information where it is no longer necessary to fulfil the purposes for which the information was collected or as required by law.

### 6.5. ACCESS AND CORRECTION

A customer wishing to access their personal information should contact Gippsland Water's Privacy Officer (Tel 03 5177 4600). Access will be provided except in the circumstances outlined in the Act, for example, where the information relates to legal proceedings or where the *Freedom of Information Act* 1982 applies.

Gippsland Water will take reasonable steps to ensure that the personal information it collects uses and discloses in the course of its business is accurate, complete and up-to-date. If a customer believes that their personal information is inaccurate, incomplete or out of date, they may request Gippsland Water to correct the information. Such requests will be dealt with in accordance with the *Privacy and Data Protection Act* 2014.

### 6.6. ANONYMITY

Where lawful and practicable, Gippsland Water will give the customer the option of not identifying themselves when supplying information or entering into transactions.

## 6.7. EXTERNAL CONTRACTORS

Whilst Gippsland Water staff usually handle personal information, Gippsland Water may outsource some of its functions to third parties. This may require the contractor to collect, use or disclose certain personal information (eg Debt Collection services).

It is Gippsland Water's policy to require all existing contractors to comply with the Act, and all new contracts will include privacy information clauses as a condition of the contract. Contractors will not be reengaged for further work if they do not commit to comply with these requirements.

## 6.8. COMPLAINTS

If a customer feels aggrieved by Gippsland Water's handling of their personal information, they may make a complaint to Gippsland Water's Privacy Officer (Tel 03 5177 4600). Each complaint will be investigated as soon as possible (but not later than 10 business days from the date of the complaint) and the customer will be provided with a written response. Such response may be interim in nature if insufficient time does not allow a full reply.

Alternatively, a customer may make a complaint to the Privacy Commissioner (although the Commissioner may decline to hear the complaint if the customer has not first made a complaint to Gippsland Water).

## 6.9. PRIVACY OFFICER

The Privacy Officer will be responsible for responding to customer requests and complaints, and to provide information and advice to Gippsland Water Board (where appropriate), employees and contractors.

The Privacy Officer will have responsibility for ensuring compliance with the *Privacy and Data Protection Act 2014*. This includes reviewing the policy document and procedural guidelines when necessary and liaising with management to ensure the policy is part of Gippsland Water practices.

## 6.10. STAFF TRAINING & AWARENESS

In order to ensure ongoing compliance with the requirements of the *Information Privacy Act 2000*, Gippsland Water will ensure that those employees dealing with personal information are provided with regular updates and trained in the following areas:

- Procedures for answering customer Privacy enquiries
- Procedures for handling Privacy complaints
- Procedures for handling the release of information to third parties

The internal "Answering Telephone Calls" procedure exists (COR/03/8729) to ensure that all Gippsland Water employees are familiar with the process for releasing personal information to third parties, as well as their obligations under the *Privacy and Data Protection Act 2014*.

## 7. POLICY REVIEW

This policy will be reviewed annually by the Manager Commercial Services and the General Manager Corporate Services and submitted to the Board for approval, to ensure it reflects current day business realities, relevance, and continued application.