Policy

Privacy

Purpose

This Privacy Policy details how Bridge Housing Limited (ACN 760 055 094) and our related bodies corporate (**we, us, our** or **Bridge Housing**) protects your privacy and how we comply with the requirements of applicable privacy laws. This Privacy Policy has been developed in accordance with the privacy laws that apply to us, including:

(a) the *Privacy Act 1988* (Cth) and the 13 Australian Privacy Principles*;*

(b) the *Health Records and Information Privacy Act 2002* (NSW) and the 15 Health Privacy Principles; and

(c) any other applicable laws which apply to how we collect, store, use and disclose your personal information,

(together, **Applicable Privacy Laws**)*.*

Scope

This Privacy Policy covers how we manage your personal information.

Specifically, this Privacy Policy describes:

- From whom we collect personal information.
- The types of personal information collected and held by us.
- How this information is collected, held and secured.
- The purposes for which your personal information is collected, held, used and disclosed.
- To whom we usually disclose your personal information.
- The types of cookies we deploy on our website.
- How you can gain access to your personal information and seek its correction.
- Whether we are likely to disclose your personal information to any overseas recipients.
- How you may complain or inquire about our collection, handling, use or disclosure of your personal information and how that complaint or inquiry will be handled.

Policy statement

Bridge Housing recognises the importance of protecting your privacy. We are committed to ensuring the continued integrity, security and responsible handling of any personal information we collect in the course of our activities. We strive to exceed legal requirements and implement best practices that safeguard your privacy.

If you have any queries or concerns about how we manage your personal information, we encourage you to contact us using the contact details set out below at the bottom of this Privacy Policy.

What is personal information?

Personal information is information or an opinion about an identified or reasonably identifiable individual, whether or not the information or opinion is true and whether or not the information is recorded in a material form.

Sensitive information is a type of personal information that has a higher level of protection under Applicable Privacy Laws. It includes information such as racial or ethnic origin, religious beliefs, political opinions, criminal records and health information.

Who do we collect personal information from?

At Bridge Housing, we collect personal information from applicants, tenants, and members of tenants' households, job applicants, staff, volunteers and including anyone who interacts with us, like visitors, volunteers and contractors.

What kinds of personal information do we collect and hold?

We collect and hold personal information in the course of conducting our functions and activities as a Community Housing Provider, and for purposes connected with those functions and activities (together, our **activities**).

The kinds of personal information we collect is largely dependent upon whose information we are collecting and why we are collecting it. Not all types listed below are collected from every person. In line with our activities, the types of personal information we may collect and hold include the following:

- **Identity and contact information** including names, residential addresses, email addresses, and other contact details. Dates of birth, next of kin details, identification documents such as driver's licence, proof of age card, passport (and visa, if relevant), photographic images and attendance records.
- **Financial information**, including your bank statements, payslips and information associated with your payment details (please note that payment transactions are processed by an authorised third party and are encrypted by the acquiring bank)
- **Sensitive information** (particularly in relation to providing appropriate housing services and our work health and safety obligations) including where relevant, religious beliefs, government identifiers, nationality, country of birth, languages spoken at home, family court orders and criminal records.
- **Health information** (particularly in relation to providing appropriate housing services and complying with our work health and safety obligations) including medical records, disabilities, individual health care plans, and counselling reports.
- **Digital information** including written and oral communications gathered in the course of our interaction with you, including where you interact on social media and emails, provide feedback and online reviews and other information from your interactions with us online, cookie information, IP address, URLs, search histories and other associated information.

How do we collect your personal information?

How we collect personal information will largely be dependent upon whose information we are collecting. The ways we may collect your personal information are as follows.

- *Directly from you*. If it is reasonable and practical to do so, we collect personal information directly from you. If you are a tenant, we collect personal information from you in the following ways:
    - via forms you submit to us in person or online;
    - over the phone;
    - when using the MyBridge Tenant Portal;
    - in person, including where you are being assisted by a third party support carer and/or translator;
    - by email or other online means.
- *From third parties*. Where it is impractical or unreasonable to collect personal information from you directly, we may collect or confirm this information from a third party. We will use reasonable efforts to obtain your consent prior to contacting a third party for this collection. Specifically, we engage referring agencies, service providers including health service providers and partner agencies), independent sources (e.g. a telephone directory and/or the Social Housing Register) or subcontractors.

Where possible, we have attempted to standardise the collection of personal information by using specifically designed forms (e.g. Application Form or a Consent to Exchange Form). However, given the nature of our operations, we often also receive personal information by email, letters, notes, over the telephone, in face to face meetings, through financial transactions and through surveillance activities such as the use of CCTV security cameras or email monitoring. Regardless of how we collect your personal information, we take reasonable steps to ensure that you are aware of certain privacy matters, including by providing you with a collection notice at the time of collection, referring you to this Privacy Policy, or through other appropriate means.

Sometimes we may be provided with your personal information without having sought it through our standard means of collection. We refer to this as "unsolicited information". Where we collect unsolicited information, we will only hold, use and/or disclose that information if we could otherwise have collected the unsolicited information using our standard collection practices. Complaints about individuals are unsolicited information. If we determine within a reasonable period that the unsolicited information could not have been collected by standard means then we will destroy, permanently delete or de-identify the information as appropriate, unless required by law to retain it.

How we use and disclose personal information

We only use or disclose personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or if you have consented to a particular use or disclosure.

The purposes for which we collect, hold, use and disclose personal information may include:

- Providing housing and related services, including tenancy management, property maintenance and related support services.
- Complying with our legal and regulatory obligations, including complying with our obligations as a Community Housing Provider and satisfying our duty of care to tenants, workers and child protection obligations.
- Communicating with tenants and stakeholders, including providing updates on community housing matters through correspondence, newsletters, magazines and other publications.
- Conducting marketing and promotional activities to support and expand our activities.
- Enhancing our operations and service delivery, including training our staff, systems development, developing new programs and services. Where possible, we use de-identified information for research, statistical analysis and reporting.
- Managing administrative functions, including financial management, insurance and record-keeping.
- Recruiting and employing staff, including processing applications.
- Engaging and managing volunteers, including screening, onboarding and co-ordinating volunteer activities.

We may disclose your personal information to the following third parties for their use for the same purposes as listed above.

- Our related bodies corporate and affiliates.
- Government agencies and regulatory bodies, including housing authorities, social services, and compliance agencies, as required by law or funding agreements.
- Third party auditors and compliance assessors who assist in ensuring regulatory compliance and service quality.
- Our third party service providers who support us with:
    - Asset maintenance, including contractors and tradespeople responsible for property repairs and upkeep;
    - Administrative and operational services, such as call centres, handling of complaints, IT support, payment processors, legal and financial advisors and insurers; and
    - Partner support agencies and business partners.

We will only disclose your personal information if one or more of the following apply:

- You have consented.
- You would reasonably expect us to use or disclose your personal information in this way.
- We are authorised or required to do so by law, including to comply with our reporting obligations as a community housing provider.

- Disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety.
- Where another permitted general situation or permitted health situation exception applies.
- Disclosure is reasonably necessary for a law enforcement related activity.

We only collect sensitive information reasonably necessary for one or more of these functions or activities:

- If we have the consent of the individuals to whom the sensitive information relates;
- If the collection is necessary to lessen or prevent a serious threat to life, health;
- Safety, or another permitted general situation (such as locating a missing person); or
- A permitted health situation (such as the collection of health information to provide a health service) exists.

We will only use or disclose sensitive information for a secondary purpose if you would reasonably expect us to use or disclose the information and the secondary purpose is directly related to the primary purpose.

Storage and security of personal information

We store personal information in a variety of formats including on databases, in hard copy files and on personal devices including laptop computers, mobile phones, cameras and other recording devices. The security of your personal information is of importance to us and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure. These steps include:

- Restricting access to information on our databases on a need to know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- Ensuring all staff are aware that they are not to reveal or share personal passwords.
- Ensuring where sensitive and health information is stored in hard copy files that these files are stored in lockable filing cabinets. Access to these records is restricted to staff on a need to know basis.
- Implementing physical security measures around the buildings and grounds to prevent break-ins.
- Implementing ICT security systems, policies and procedures, designed to protect personal information storage on our computer networks.
- Developing and implementing human resources policies and procedures, such as email and internet usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- Undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with Applicable Privacy Laws.

- Requiring third party service providers to sign confidentiality and privacy undertakings where practicable.
- Subject to any retention obligations we have under the *Residential Tenancies Act 2010* (NSW), personal information we hold that is no longer needed for the original purpose for which it was collected is destroyed in a secure manner, deleted or de-identified as appropriate.

Our website may contain links to other websites. We do not share your personal information with those websites, and we are not responsible for their privacy practices. Please check their privacy policies.

Disclosure of personal information to overseas recipients

We may disclose personal information about an individual to overseas recipients in certain circumstances, such as storing information with a "cloud service provider" which stores data outside Australia. Data Storage must comply with Australian Privacy Principles and relevant data protection laws - as per Australian Privacy Act see https://www.oaic.gov.au/ , Australian Privacy Principles (APP)

Regardless of the location of our processing, we will impose adequate data protection safeguards and implement appropriate measures to ensure that your personal information is protected in accordance with Applicable Privacy Laws.

Cookies

Our website and services delivered online use cookies and other similar technologies, for example, to distinguish you from other users when you browse our websites or use our online services and to allow us to improve our online services.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently to improve the user experience, as well as to provide certain information to the owners of the site.

We deploy the following types of cookies and digital identifiers.

- Necessary cookies. These cookies are essential for our website's functionality, such as remembering user preferences and maintaining security.
- Analytics cookies. These cookies collect anonymous data to track website usage, measure traffic and generate reports on visitor behaviour.
- Performance cookies. These cookies improve website speed and responsiveness and ensure a better user experience.

You can manage or disable cookies through the settings on your browser. However, doing so may affect the functionality of certain website features

Artificial Intelligence

Bridge Housing's use and adoption of artificial intelligence technologies is governed by its AI Governance Strategy. We do not input personal information into such artificial intelligence technologies.

How we ensure the quality of your personal information

We take all reasonable steps to ensure the personal information we hold, use, and disclose is accurate, complete and up to date. These steps include ensuring that the personal information is accurate, complete and up to date at the time of collection and when using or disclosing the personal information. On an ongoing basis we maintain and update personal information when we are advised by individuals or when we become aware through other means that their personal information has changed.

Please contact us if any of the details you have provided change. You should also contact us if you believe that the information we have about you is not accurate, complete or up to date.

How to gain access to your personal information we hold

You may request access to the personal information we hold about you, or request that we change the personal information, by contacting us. We will respond to your request and attempt to provide you with access to your personal information within a reasonable time (usually no longer than 30 days of receipt of your request).

If we do not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change and we will attach this to your record.

Privacy complaints

If you wish to make a complaint about a breach by us of your privacy (that includes the Australian Privacy Principles or the Health Privacy Principles) you may do so by providing your written complaint by email, letter, fax or by personal delivery to any one of our contact details as noted below. You may also make a complaint by phoning or face to face.

We will respond to your complaint within a reasonable time (usually no longer than 30 days) and we may seek further information from you in order to provide a full and complete response.

If you do not consider our response satisfactory, you may contact the Office of the Australian Information Commissioner at its website www.oaic.giv.au or by telephone on 1300 363 992.

How to contact us

You can contact us about this Privacy Policy or about your personal information by:

Emailing: privacy@bridgehousing.org.au

Calling: +612 8324 0800

Writing to our Privacy Officer at: PO Box 20217,

World Square, NSW 2002

If practical, you can contact us anonymously (i.e., without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

Changes to our privacy and information handling practices

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website www.bridgehousing.org.au regularly for any changes. The date listed at the bottom of this page indicates when this Privacy Policy was last updated.

If we make a material change to our Privacy Policy and the way in which we handle your personal information, we will inform by issuing a notice that includes a summary of the change. This notice may be provided through our website, via email or through other appropriate communication channels.