

|                         |                          |                            |                                |
|-------------------------|--------------------------|----------------------------|--------------------------------|
| <b>POLICY REFERENCE</b> | GOV-POL-06               | <b>VERSION</b>             | 1.2                            |
| <b>POLICY CATEGORY</b>  | Statutory and Governance | <b>DOCUMENT CONTROLLER</b> | Corporate Services Coordinator |

|                    |   |
|--------------------|---|
| <b>SCOPE</b>       | This policy applies to all Employees, Contractors and Volunteers.   |
| <b>PURPOSE</b>     | This policy outlines the classification of private information and the appropriate handling of it.  |
| <b>DEFINITIONS</b> | <ul style="list-style-type: none"> <li>• CCA – The Cradle Coast Authority.</li> <li>• Chief Executive Officer (CEO) – The legally accountable officer for all CCA operations.</li> <li>• Commercial Information – Information which maybe advice, opinion whether true or not, fact and whether recorded in a material form or not, about a commercial or not for profit entity whose identity is apparent, or can reasonably be ascertained, from the information or opinion.</li> <li>• Manager – Manager responsible for a defined Business Unit or business function as determined by the CEO.</li> <li>• Personal Information – Information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. Includes name, residential address, postal address, date of birth, gender of an individual and bank details as examples.</li> </ul>   |
| <b>POLICY</b>      | <p><b>Commercial Privacy</b></p> <p>The CCA is committed to ensuring its commercial information remains private in so far as reasonably practicable for conducting of business. Information which may be considered private should not be disclosed without authorisation and will only be used for the purposes for which any such authorisation is given.</p> <p>Commercially private information relates to:</p> <ul style="list-style-type: none"> <li>• CCA commercial information.</li> <li>• Commercial information of others which the CCA has been given or has through its business come into connection with.</li> <li>• Non-publicly listed information.</li> <li>• Information marked private and/or confidential.</li> <li>• Information a reasonable person would identify as sensitive and/or private and/or confidential.</li> </ul> <p>Privacy applies to information irrespective of the medium in which it is delivered e.g. verbally, in writing, electronically.</p> <p>Information which could be considered private should be secured in an appropriate place or destroyed in a suitable way.</p> <p>Failure to adhere to commercial privacy requirements as stated in this policy may results in disciplinary action in accordance with the <i>Code of Conduct Policy (HR-POL-11)</i>.</p> |

## Personal Privacy

From time to time the CCA may gather personal information on individuals as part of research, information disbursement, project implementation or for general contact reasons. On each occasion the purpose of gathering information will be known and the party advised.

Information will only be collected when consent is given. Information collected will only be used for purpose for which it was gathered or for a related secondary purpose within the individual's reasonable expectations. If information is used for secondary purposes, CCA will only use what is required and will ensure it cannot be linked to an individual.

Information may be collected in person; via an application form, survey or other document; or online. Where possible, personal information will only be collected directly from an individual.

If information is collected from any other source besides the individual, reasonable steps will be taken to ensure the individual is aware that this has occurred and be provided with an explanation of why the information has been collected.

The CCA generally uses personal information to:

- Provide individuals with services or programs they have expressed interest in.
- Communicate with individuals.
- Provide individuals with ongoing information about promotions or programs which the CCA believes they may be interested in.
- Give individuals the opportunity from time to time to receive e-mail and news from the CCA.

Information collected via online browsing of CCA information e.g. domain statistic data will only be used for the purpose of statistics or at the request of a legal investigation.

If an Employee becomes aware of any errors in personal information held by the CCA, they will correct the information or securely dispose of the information if its accuracy cannot be verified. Individuals can request access to their own personal information held by the CCA and correct any errors in that information.

The CCA takes a number of steps to ensure that personal information stored or disposed of is protected from misuse, from loss and from unauthorised access, modification or disclosure. These steps include password locking of computers and relevant files; the availability of secure paper disposal services in the office; and key-locked cabinets and storage areas.

Personal information will be properly disposed of when no longer required and personal information will not be provided to a third party without prior consent.

Privacy statements reinforcing this policy and the CCA's adherence to privacy legislation are contained on the CCA's website ([www.cradlecoast.com](http://www.cradlecoast.com)). Employees can refer individuals with enquiries about the CCA's collection, use, storage and disposal of personal information to this site.

The following statement is used on the CCA's website:

"Personal information will only be used for the purposes of conducting the CCA's business and will be securely stored and disposed of when no longer required. Personal information will not be provided to a third party without your prior consent. To see our full Privacy Policy, [click here](#)"

## Images

|                                 |  |                                       |                                    |   |                                      |
|---------------------------------|--|---------------------------------------|------------------------------------|---|--------------------------------------|
|                                 | <p>The CCA takes photographs and is given photographs relating to the region and its programs. These photographs sometimes feature identifiable individuals or groups of people.</p> <p>If a photograph featuring identifiable people is taken by an Employee or is provided to the CCA for use in any external communications, a Photo Consent Form should be completed. If the photo contains a minor, a photo consent form should be completed by the parent or legal guardian. The consent enables the individual(s) featured in the photograph to provide approval for that image to be stored and used publicly by the CCA.</p> <p>Consent can either be given by completing the form at the time that a photograph is taken or before a photograph is to be used for external communications.</p> <p>If a Photo Consent Form is not completed for whatever reason, it is still possible to use the image in public promotions if the employee and their manager agree that there is a low risk of objection (ie: considering both the media in which the image will be used and their knowledge of the person featured in the image).</p> <p><b>Workplace Privacy</b></p> <p>Regardless of the content throughout this policy, CCA reserves the right to monitor Employee work related activity as it determines necessary.</p> <p><b>Privacy compliance</b></p> <p>The CCA will comply with the various privacy legislation which relates to individual and commercial privacy: <i>The Privacy Act 1998 (Cth)</i> and the <i>Personal Information Protection Act 2004 (Tas)</i>.</p> |                                       |                                    |   |                                      |
| <p><b>RELATED DOCUMENTS</b></p> | <p><a href="#">Code of Conduct Policy (HR-POL-09)</a></p> <p><a href="#">Photo Consent Form for Adults &amp; Minors Template (GOV-FM-05)</a></p> <p><a href="#">The Privacy Act 1998 (Cth)</a></p> <p><a href="#">Personal Information Protection Act 2004 (Tas)</a></p>   |                                       |                                    |   |                                      |
| <p><b>DOCUMENT HISTORY</b></p>  | <p><b>Version</b></p>  | <p><b>Commentary</b></p>              | <p><b>Date approved by CEO</b></p> | <p><b>Date reviewed by Audit &amp; Risk Committee</b></p> | <p><b>Date approved by Board</b></p> |
|                                 | 1.0  | Policy introduction                   | 29/04/2014                         | N/A   | 13/05/2014                           |
|                                 | 1.1  | Update to include photo consent forms | 28/05/2015                         | N/A   | N/A                                  |
|                                 | 1.2  | Policy review – minor amendments      | 15/06/2020                         | 25/06/2020  | 09/07/2020                           |