

Privacy policy– Guardian Living Australia

We respect your privacy and understand that it's important to let you know how we collect, administer and store any personal information from you, and the ways we may use it.

Our Privacy Policy has been developed in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988 (Cth)* (**Privacy Act**). By providing your personal information to us directly or indirectly you accept the terms of this Privacy Policy.

What we collect

The type of information that we collect from you will depend on how you engage with us. Primarily our focus is on the development of new housing opportunities for people with disability and complex/very high support needs, and in seeking people who want to live in those dwellings.

In order to provide that activity, we collect name, contact information including address, email address and telephone number, demographic information such as age, guardian details (if applicable), on potential tenants. We collect information specifically about disability/ies and the affect these have on access, self-management and support that will be required to live in one of our dwellings. Information about family and other supporters, and the contact details of services involved, is also collected.

If you are under 18 years of age your parent or legal guardian must approve the provision of personal information before we can collect any of your personal details.

Use of your information

Personal information that you submit to us, through email, via our website or otherwise, which is used to determine eligibility and suitability for one of our housing options, can be quite detailed, so we make sure it is always kept secure.

We collect and store personal information, with your consent, when it is relevant for us to provide our services. We sometimes collect your personal information from third parties, but again only if you give your consent, or it would be reasonably expected as part of our service offering.

We will only use your personal information for the purposes for which it was given to us, or for purposes which are directly related to the provision of our services:

Examples of this include:

- to assist you to conveniently and easily access the housing and support services that we offer and provide;
- to form and maintain a register of interest for future housing we are developing;
- for internal record keeping and confidential reporting;
- to periodically send you information that you may find interesting;
- to confirm or propose your eligibility under the NDIS, for Specialist Disability Accommodation (SDA).

With your consent, we may also use personal information collected to:

1. make submissions that are usefully supported by personal stories;
2. present at conferences and meetings; and
3. develop case studies, using written and video content.

In those instances we will specifically ask you for your permission.

Disclosure

We may disclose your personal information to anyone authorised by you, or to whom you have provided your consent (either expressly or impliedly) or where another permitted general situation applies (as defined in Section 16A of the Privacy Act).

We will not disclose information that personally identifies you to any third party other than as set out in this Privacy Policy.

We can provide you with access to the personal information we have stored on you. If you make a request we will respond within a reasonable period of time and, where reasonable and practicable, give access to the information in the format you request. This will be subject to any exemptions provided under the Privacy Act. You have the right to seek correction, if you identify anything incorrect or unnecessary in what we have stored.

Storage and Destruction

We implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or disclosure, through:

- Prior to disclosing any personal information to any recipient including a provider of IT services such as servers or cloud services, we establish that they comply with privacy requirements, and have systems which provide sufficient security.

We will destroy personal information once it is no longer required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.

Data Quality

We require that our data is of high quality, by taking reasonable steps to ensure any information collected is:

- accurate,
- complete,
- up to date, and
- relevant to the functions required.

Breaches of Privacy

If you wish to make a complaint about a breach of the Privacy Act by us, you can do so by providing your complaint in writing via the contact details listed here on our web-site. You may also make a complaint verbally by calling our office on 0473 144 839 We will seek to respond to any complaint within a reasonable period of time. We may seek further information from you in order to provide a comprehensive and complete response.

If you are not satisfied with our response to your complaint, you may also make a complaint to the Office of the Australian Information Commissioner (OAIC). You may contact the Australian Information Commissioner via telephone on 1300 363 992, by submitting a complaint or inquiry online at www.oaic.gov.au or by writing to the OAIC at GPO Box 5218 Sydney NSW 2001.

Consent to variation

We may vary the terms of this Privacy Policy from time to time. You should check regularly to make sure that you are aware of any variations made to this Privacy Policy.

Definitions:

In Privacy Policy, different terms are used, and are defined below:

Personal information means information or an opinion that is recorded in any way (for example: on paper, or a computer or in other ways like audio recordings). The information doesn't have to be true. But a person does need to be able to be identified from the information.

Health information is personal information (as defined above) that *also* contains information about:

- the physical, mental or psychological health of person;
- the disability of a person;
- a person's wishes about the health/disability services provided to them in the future; or
- a health/disability support or service that is being, or will be provided to a person.

Sensitive information is a type of personal information. It includes information about an individual's racial or ethnic background, political opinions, membership of a political organisation, religious or philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices and their criminal record.