

419 Privacy Policy

1. Policy statements

Link Housing Limited ACN 003 084 928 (**Link Housing**) collects and administers a range of personal information in the course of providing community housing services and management services for affordable properties. Link Housing is committed to protecting the privacy of personal information which it collects and holds.

Link Housing will only collect personal information which is reasonably necessary for Link Housing's functions and activities.

2. Australian Privacy Principles

Link Housing must comply with the Australian Privacy Principles (**APP**) under the *Privacy Act 1988* (Cth). The purpose of this policy is to explain:

- The kinds of information that Link Housing may collect and hold about an individual and how that information is held;
- How Link Housing collects and holds personal information;
- The purposes for which Link Housing collects, holds, uses and discloses personal information;
- How an individual may access their personal information that is held by Link Housing and seek the correction of such information;
- How an individual may complain about a breach of privacy, and how Link Housing will deal with such a complaint; and
- Whether Link Housing is likely to disclose personal information to overseas recipients.

3. Types of personal information collected

Tenants/Applicants

Link Housing collects information from individuals which is necessary to provide accommodation and support services and assess an individual's suitability to receive accommodation and support services. This includes collecting personal information such as an individual's name, address, telephone number, Centrelink reference number, bank account details, income, ethnicity, date of birth, gender, disability status, your health history, family history, lifestyle factors and any other information which is necessary to enable an individual to participate in social or affordable housing.

Job applicants

Link Housing collects information from individuals which is necessary to assess and engage applicants. This includes collecting personal information such as an individual's name, address, telephone number, professional experience, qualifications, references and past employers, and any other information which is necessary to assess your suitability for employment.

Directors and committee members

Link Housing collects information from individuals for the purposes of individuals becoming or being directors or committee members, and to enable Link Housing to appropriately manage its governance obligations. This includes collecting personal information such as an individual's name, address, telephone number, professional experience, qualifications and past appointments, and any other information which is necessary for Link Housing to collect to properly discharge its governance obligations.

Landlords

Link Housing collects information from individual landlords for the purposes of managing properties used to provide accommodation services. This includes collecting personal information such as your name, address, telephone number, email address, bank account details and any other information which may be required to manage tenancies.

Carers/Guardians/Attorneys/Relatives

Link Housing collects information about our tenants' carers, guardians, attorneys, and next-of-kin for the purposes of contacting those individuals as needed to appropriately support our tenants. This includes collecting personal information such as your name, address, telephone number and email address.

Donors

Link Housing collects information from individuals for the purposes of fundraising and managing donations. This includes collecting personal information such as your name, address, telephone number, email address and credit card details.

4. Collection of personal information

Link Housing will only collect personal and sensitive information that is necessary for it to carry out its business activities.

Where possible, personal information will be collected directly from individuals. However, information may also be collected from multiple sources including directly from an individual, via a government agency, police records, landlords (past and present), recruiters, employers (past and present), support partners and external referees.

5. CCTV

Link Housing uses camera surveillance systems (commonly referred to as CCTV) in certain properties it manages for the purposes of maintaining safety and security of its tenants and personnel. Those CCTV systems also collect and store personal information and Link Housing will comply with all privacy legislation in respect of any such information.

6. Use of personal information

Link Housing only uses your personal information for the purpose for which it was collected by Link Housing (**primary purpose**), unless:

- there is another purpose (**secondary purpose**) and that secondary purpose is related to the primary purpose, and the individual would reasonably expect, or Link Housing has informed the individual that your information will be used for that secondary purpose; or
- you have given your consent for your personal information to be used for a secondary purpose; or
- Link Housing is required or authorised by law to use your personal information for a secondary purpose (including for research and quality improvements within Link Housing).

For example, Link Housing may use an individual's personal information to:

- provide accommodation services and support services to an individual, or assess an individual's suitability to receive such accommodation and support services;
- notify individuals of services which Link Housing reasonably considers may be suitable to an individual's needs;
- for the purposes of managing and maintaining properties;

- invite individuals to events which Link Housing facilitates or organises, where we reasonably consider those events are relevant to the services Link Housing provides to the individual;
- appropriately manage our business, such as reporting to any third parties to which Link Housing has contractual obligations, assessing insurance requirements, conducting audits and maintaining our registration as a community housing provider;
- assess an individual's suitability to work within Link Housing's accommodation services business;
- assist it in running its accommodation business, including quality assurance programs, billing, improving services, implementing appropriate security measures, conducting research and training personnel; and
- effectively communicate with third parties, including Centrelink and the Department of Family and Community Services.

7. Disclosing personal information

Link Housing will confine its disclosure of an individual's personal information to the primary purpose for which that information has been collected, or for a related secondary purpose. This includes when disclosure is necessary to provide services to an individual, assist Link Housing in running its organisation, for security reasons or to lessen threats to life, health and safety of an individual.

We may provide your personal information to:

- government agencies, such as Centrelink and Department of Family and Community Services, where an individual is receiving services from Link Housing under arrangements with those agencies;
- government departments responsible for social services, health, aged care and/or disability where Link Housing has a legal or contractual obligation to do so;
- third parties contracted to provide services to Link Housing, such as entities contracted to assist in Link Housing's business operations, accommodation services, registration processes, quality assurance programs or survey processes;
- anyone authorised by an individual to receive his/her personal information (consent may be express or implied); and
- anyone Link Housing is required by law to disclose an individual's personal information to.

8. Use of personal information for direct marketing

Link Housing will from time to time send information and invitations regarding services offered by us or third party providers where it considers such services may be reasonably suitable to an individual's needs. Individuals can opt out of receiving such notifications and invitation at any time, by contacting the Privacy Officer on the details set out in section 11 below.

9. Disclosure of information to overseas recipients

Link Housing does not disclose personal information to any overseas recipients. However if a request is received, Link Housing will contact the individual in the first instance, outline the request and seek approval to provide the personal information. Approval from an individual to such disclosure must be provided in writing.

10. Quality of personal information

Link Housing will take reasonable steps to make sure that the personal information collected, used or disclosed is accurate, complete and up to date.

11. Accessing and amending personal information

Each individual has a right to access their personal information which Link Housing holds about them. If an individual makes a request to access their personal information, Link Housing will ask for verification of identity and request that the information sought be specified.

An individual can also request an amendment to any of their personal information if they consider that it contains inaccurate information.

Link Housing can be contacted about any privacy issues as follows:

Privacy Officer (Deon Wyngaard)
privacy@linkhousing.org.au
Telephone: 02 9412 5111

While Link Housing aims to meet all requests to access and amendments to personal information, there may be some instances where Link Housing is unable to do this where it may adversely affect an individual's health and safety.

12. Security of personal information

Link Housing will take reasonable steps to protect any personal information collected to ensure protection from unauthorised access, misuse, loss, theft, modification and/or unauthorised disclosure.

Reasonable steps include:

- Verifying the identity of any individual wishing to access their personal information;
- Implementing computer system safeguards including password protection and rules of user access;
- Monitoring computer information systems to test and evaluate data security in line with the appropriate industry standards;
- Provision of lockable physical security for paper records;
- Ensuring that information is transferred securely;
- Archiving information in a secure and accessible manner;
- Storing material for a legal period and then disposing of it securely; and
- Ensuring there is reasonable physical security in Link Housing's offices.

13. Openness

Link Housing's Privacy Policy is available publically on its website (www.linkhousing.org.au) and can also be obtained on request by contacting Link Housing on (02) 9412 5111.

14. Anonymity

Where possible and practicable, an individual will have the option to deal with Link Housing on an anonymous basis or by using a pseudonym. However, if the personal information provided to Link Housing is incomplete or inaccurate, or any personal information is withheld, Link Housing may not be able to provide the services or support being sought, or deal with an individual effectively.

15. Complaints and appeals

Any person who has a complaint about Link Housing's information handling practices or considers Link Housing has breached their privacy, can contact Link Housing in the first instance by emailing the Privacy Officer (Deon Wyngaard) at privacy@linkhousing.org.au, or contact the Privacy Commissioner of NSW (phone: 1300 363 992, email: enquiries@oaic.gov.au).

16. Legal and regulatory framework

- *Privacy Act 1988*

17. Quality Assurance / Review

The Privacy Policy will be formally reviewed every two years, or when necessitated through a sufficient change in circumstances or legislation.