

## Privacy Policy

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This policy is applicable to: **All Employees**

### 1. Introduction

The protection of GAC Members and Beneficiaries private information and the maintenance of their personal information remaining confidential is paramount. GAC acknowledge the ongoing trust individuals bestow in them to protect personal information.

GAC commits to ensuring that its Member's privacy is protected. If any Members personal, private or sensitive information is required by the corporation, Members can be assured that their information will only be used for the purpose requested and in accordance with this Privacy Policy.

The Privacy Act 1988 sets out statutory obligations which individuals and businesses must comply with. All organisations are bound by the Australian Privacy Principles (APPs) which regulate how organisations collect, use, disclose and store personal information – as well as how individuals are able to access and correct their personal information.

### 2. Definitions and Key Terms

<b>EO</b>	Executive Officer of Gumala Aboriginal Corporation
<b>GAC</b>	Gumala Aboriginal Corporation
<b>Rule Book</b>	The constitutional document that governs how GAC is to be run, in accordance with law.
<b>Trust Deed</b>	The General Gumala Foundation Consolidated Trust Deed
<b>Member</b>	Any approved Bunjima, Yinhawangka and Nyiyaparli persons who are entered on the register of Members by Gumala Aboriginal Corporation
<b>Personal information</b>	As defined in the <i>Privacy Act</i> 1988 (Cth) as: information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable: See <b><u>5.1</u></b>
<b>Privacy Act</b>	Privacy Act 1988



**Sensitive information** As defined in the *Privacy Act* 1988 (Cth) to mean information or an opinion about an individual: See [5.2](#)

### 3. Scope

This policy applies to all GAC Members and Employees, including directors. It applies to GAC's management of the personal information of our Members, employees, directors, customers, suppliers and prospective Members and employees.

### 4. Purpose

The purpose of this policy is to clearly set out the organisations practice of privacy in relation to Members', employees and Directors' personal information as a part of the organisation.

### 5. What is Privacy?

Privacy can be referred to as personal information that has the potential to identify you, for example, a person's name or photo. The Privacy Act 1988 governs all medium to large businesses and not-for-profit; and regulates the privacy component on the consumer private health services, the credit reporting industry, and all organisation trading in personal information.

Privacy is important as it is about protecting personal information through appropriate controls such as this policy.

#### 5.1. What is personal information?

The Privacy Act 1988 regulates how personal information is handled. The Act also defines personal information as:

'Information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable'

Common examples are an individual's name, signature, address, telephone number, date of birth, medical records, bank account details, and commentary or opinion about a person.

Any other financials relating to a GAC Member and employee including income and disbursements.

## **5.2. What is sensitive information?**

Sensitive information is a sub-set of person information and is given a higher level of protection. The Privacy Act 1988 defines 'sensitive information' to mean any information or an opinion about an individual's:

- Racial or ethnic origin;
- Political opinion;
- Membership of a political association;
- Religious beliefs or affiliations;
- Philosophical beliefs;
- Membership of a professional or trade association;
- Membership of a trade union;
- Sexual preferences or practices; or
- Criminal record.

'Sensitive information' also includes health information and genetic information about an individual that is not otherwise health information.

## **6. Information which GAC collect about its Members, employees and stakeholders?**

The types of information required to be collected from its Members, employees and stakeholders will differ. These may include but are not limited to:

- 1 Identification information, specifically, date of birth, full names and gender
- 2 Personal particulars, specifically, phone and email details
- 3 Property details, specifically, residential and postal addresses
- 4 Member information, specifically, participation in meetings or applications
- 5 Consumer information, specifically, program expenditure and suppliers used

These may be required when completing Member's applications and will only be used for the purposes that is required and not for any other purpose without the consent of the Member.

## **7. How does GAC collect personal and sensitive information?**

GAC will only collect personal information about a Member that is necessary to perform its operational functions and activities under the Trust Deed, generally



providing goods or services to its Members. This includes personal details that may need to be updated for the organisations records as per clause 6.

On occasion GAC may be required to provide the Members personal information (see 5.1 for definition) to third parties as proof of identification when collecting goods from stores or other service providers as per Members program applications.

GAC may be required to collect sensitive information from its Members including health information for the completion of applications relating to medical expenses. Although it may be a requirement, it is up to the Members discretion if they choose to provide such information.

All information collected by GAC by all methods, being either by telephone, email, fax or any other method of communication not listed, will be protected by GAC to the best of GAC's ability.

## **8. How GAC holds and protects personal and sensitive information?**

GAC understands the importance of storing personal information securely. GAC protects all personal information from misuse, loss, unauthorised access, alteration and disclosure. The personal information of its Members that is stored at GAC is only accessible by authorised GAC employees and will not become available to the public, unless required to do so in accordance with this policy.

## **9. Reasons why GAC collect, disclose and store personal and sensitive information**

GAC collects, hold and discloses personal information as required, necessary for the business, functions, activities and responsibility to provide the membership with the best customer service as possible. Unless otherwise provided by law, GAC will not collect, hold, use or disclose personal or sensitive information to any third party including other Indigenous Corporations without the explicit consent of the authorising Member or employee.

## **10. Sharing of personal and sensitive information with Gumala entities**

From time to time GAC may be required to share information with the Trustee, Gumala Investments Pty Ltd (GIPL), in the rare event that this requirement arises an employee of GAC will contact the relevant Member in regard to the possible necessity of having to disclose personal or sensitive information. This information will not be



shared without the explicit consent from the affected or authorising Member or employee.