

2.3.3 Privacy Guidelines

The Privacy Act 1988 provides for the protection of an individual's personal information. The following provides guidance on how employees of Horan & Bird are required to deal with customers' personal information.

What is personal information?

Personal information is information that may identify an individual. Examples include: name, address, phone number and email address.

What is sensitive information?

Sensitive information is a subset of personal information that refers to information or an opinion about characteristics such as: racial origin, religious beliefs, trade union membership and criminal record.

When can we collect personal information?

We can only collect personal information that is reasonably necessary for one or more of our functions or activities. For example, a person's date of birth is not necessary information to complete a solar job – their address is necessary.

What functions or activities is it appropriate to collect personal information for?

Some examples are: providing the customer with information about other services that we offer that may be of interest to them, providing an accurate quote for our services, contacting customers to provide a testimonial or to complete a customer satisfaction survey or to analyse our customers' needs with a view to improving the services we offer to them.

Relevant privacy principals

1. *Collection of personal and sensitive information:*

Ensure that personal information is collected only if it is necessary for the functions and/or activities of the company and that it is obtained directly from the individual concerned.

We can only collect sensitive information if a customer consents and it is necessary for the functions and/or activities of the company.

2. *Notification of collection – what we need to inform an individual when we collect their personal information:*

Before we collect personal information from a customer *for the first time* we need to let them know:

- Why we are collecting personal information: to provide a quote/organise a job etc
- How we will treat their personal information: in accordance with our privacy policy which is available on our website.

3. *Anonymity and pseudonymity:*

In certain circumstances, a customer can request to remain anonymous or to use a pseudonym. This is more likely to be in the case where a potential customer calls wanting an estimated price for a service. This may be possible when providing general information, but in the case of providing a quote, we need to let the customer know that we cannot guarantee its accuracy without relevant information.

4. *Use of personal information:*

We can only use a customer's personal information for the primary purpose it was collected unless there is a reasonable expectation for that information to be used for another purpose. For example, if personal information is collected to provide a quote, it would be reasonable to expect that it would also be used in providing the service that was quoted.

5. *Disclosure of personal information:*

We never disclose a customer's personal information unless we have the consent of the customer. In establishing the identity of a customer or confirming their personal information, we need to ask them to provide the details – we do not give out the information for them to confirm. E.g. Say: "Mr Smith can you just confirm your address and phone number for me" NOT: "Mrs Smith, are you still at number 20 Jones Street, Kirwan?"

6. *Access to personal information:*

A customer can request access to the personal information we hold about them. Generally we are required to provide such information to them. The need to apply in writing or email: privacy@horanandbird.com.au

7. *Security of Customers' personal information:*

An organisation must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure

- Files and documents containing the personal information of customers are to be kept in a confidential location, not in view of others. Operations staff should have information locked in the boxes to be provided for each vehicle.
- Documents containing a customer's personal information should not be emailed to or from an employee's personal email address
- Electronic devices such as tablets and computers are to be password protected and secured over night or while not in use
- Computers should be locked when left inactive or unattended

8. *Complaints:*

If a customer believes we have breached their privacy, they will need to lodge a formal complaint in writing or via email to: privacy@horanandbird.com.au

9. *Our privacy policy*



Our privacy policy is available on our website: www.horanandbird.com.au if a customer would like to view the policy in full.