

PRIVACY AND CONFIDENTIALITY POLICY



Access Community Services Limited respects your privacy and is committed to protecting your personal information. Here we outline the obligations which we have in managing the personal information we hold about our clients, potential clients, contractors and others.

This Policy outlines our obligations in managing personal information about our clients, potential clients, members, contractors, employees, volunteers and others in accordance with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). This privacy and confidentiality policy is dated March 2014 and governs the Access Community Services Limited, Harmony on Carmody Café Pty Ltd, Land & Home Realty Pty Ltd, Livingin Constructions Pty Ltd, Assisting Collaborative Community Employment Support Services Inc, Access Driver Training Pty Ltd, Access Enterprise Services Pty Ltd and Work Access Pty Ltd ("Group").

Personal information we collect and hold

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

In general, the type of personal information we collect and hold includes (but is not limited to): names, birth dates, addresses, contact details, occupations, medical history and treatment, memberships and associations, financial and tax records, family situations, next of kin, emergency contact details and other information which assists us in conducting our business, providing and marketing our services and meeting our legal obligations.

Some personal information which we need to collect is 'sensitive information'. Sensitive information includes information about a person's racial or ethnic origin, political affiliation, religious affiliation, mental health, disability, trade union or other professional or trade association membership, sexual preferences and criminal record, and other health information.

Personal information is generally collected and held about clients, associates and potential clients, suppliers and their employees, and prospective employees, employees and contractors.

How we collect and hold personal information

We will generally collect personal information by way of forms filled out by people, face-to-face meetings, interviews, business cards, telephone conversations and from the third parties including Centrelink, Department of Immigration and Border Protection. We also collect personal information from our web site and the internet, through receiving subscription applications and emails. We also use third parties to analyse traffic at that web site, which may involve the use of cookies.

In some circumstances we may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another person.

We hold personal information in secure and confidential files maintained in paper and/or electronic form. Sometimes personal information held by us is securely stored with third party data storage providers. We take all reasonable steps to protect personal information held by us from misuse and loss and from unauthorised access, modification or disclosure, for example by use of restricted access to personal records.

The privacy of your information is important to us and we will take reasonable steps to ensure that information about you is not subject to the danger of being lost, destroyed or damaged or of being accessed by unauthorised parties. However we cannot guarantee the security of information about you and do not accept liability if, despite our efforts, loss or damage arises from a failure to maintain privacy.

We will hold on to the personal information for such periods as necessary for us to conduct our activities and in accordance with the requirements of law.

Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information for the primary purposes of conducting our activities which includes:

- a. operating our professional service business of providing community related services including employment and training services, Humanitarian Settlement Services, Youth Services
- b. operating our various other businesses including Café business; Cleaning, Repair, Maintenance and Removal business; Op Shop; Driving School; Property Realty business; and Building and Construction business
- c. assessing and processing inquiries and requests for the provision of our services
- d. marketing, including direct marketing and market research and analysis
- e. the general conduct, internal management and operation of our businesses in all respect including relating to management of human resources, assets, risks, services, growth and expansion, and forward planning
- f. purchasing goods and services from others and
- g. meeting of our legal obligations.

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We will not collect personal or sensitive information unless such information is reasonably necessary for the above purposes. If the personal information we request is not provided, we may not be able to provide the relevant service. We collect all Information that is necessary to effectively conduct our activities.

Information accessed within the Group and to other Third Party Service Providers

Information may be accessed by personnel within our Group. All personnel within our Group are bound by the same confidentiality laws and standards as provided by Australian Privacy Principles.

Third party service providers may also come into contact with Information when we outsource certain functions, such as: bulk mailing, client experience research, company audits and information technology support. We maintain effective control over such Information at all times and we have contractual arrangements in place with all of our third party service providers to protect Information from unauthorised use or disclosure.

Website

For statistical purposes we collect information on website activity (such as number of users who visit our website, the date and time of visits, the number of pages viewed and location). This information does not identify individuals but it does provide us with statistics that can be used to analyse and improve our website. Occasionally we analyse the traffic through our website, which may involve the use of cookies for marketing and market research more generally. See more about our Cookie Policy.

Information Quality, Access and Correction Processes

From time to time, we may take steps to update or verify personal information by collecting personal information from publicly available resources, for example, telephone directories or electoral rolls to improve the integrity of the personal information that we hold.

We provide a transparent system of allowing individuals to access their personal Information and seek corrections to any inaccuracies. Requests for access and correction to personal Information should be made by contacting our Privacy Officer at amiteshk@acsl.org.au or on 07 3442 1841 (AEST) 8.30am- 5.00pm Monday to Friday.

Complaints

Access Community Services Limited operates a transparent Privacy Complaints Handling Policy that sets out our approach to resolving any privacy complaints in a fair and expeditious manner.

If you are unhappy with the manner in which we have dealt with your personal information, or if you believe that we have breached our obligations under Australian privacy law, please refer to our Privacy Complaints Handling Policy.

Gail Ker - CEO

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PRIVACY COMPLAINTS HANDLING POLICY



Access Community Services Limited complies with the Australian Privacy Principles in the Privacy Act 1988 (Commonwealth). Our Privacy and Confidentiality Policy is available on our website, or you can obtain a copy by contacting (07) 3412 8222. The Privacy Complaints Handling Policy is to be read in conjunction with the Privacy and Confidentiality Policy.

Purpose

This policy sets out our approach to resolving complaints from individuals about the way we have dealt with their personal information, and outlines what people can expect when they make a complaint.

Management of privacy complaints

Privacy complaints are managed by the Privacy Officer.

The Privacy Officer will:

- Receive and acknowledge the complaint
- Seek further information from the complainant if necessary
- Thoroughly investigate the complaint
- Respond to the complainant with the outcome of the investigation
- Provide feedback to the relevant internal stakeholders

Complaint process

1. Complaint Receipt

Privacy complaints must be made in writing. The Privacy Officer may exercise discretion to receive an oral complaint if the Privacy Officer considers that making a written complaint would be impracticable or unreasonably onerous for the complainant. In their written complaint, the complainant should:

- Include sufficient contact details to enable us to identify them
- Clearly and succinctly state the nature of their complaint
- Include sufficient information for the Privacy Officer to understand the complaint
- Provide details such as what happened, when they became aware of it, and who was involved
- State which Australian Privacy Principle they believe has been breached (if known)
- Outline the impact the event has had on them
- Include details of what they would like to see happen to resolve their complaint

The complaint can be emailed to amiteshk@acsl.org.au, or posted to the Privacy Officer, Amitesh Kumar, Access Community Services Ltd, PO Box 10, Woodridge QLD 4114

We can only accept complaints from the individual involved, or their authorised representative. If the complainant is acting on behalf of another person, they must provide evidence of their authority to do so.

2. Complaint Acknowledgement

The Privacy Officer will acknowledge the complaint within five working days of receiving it.

3. Complaint Investigation

The Privacy Officer will investigate the concerns raised by the complainant. This may involve obtaining further information from the complainant, speaking with the relevant staff members, reviewing relevant documents or client files, and obtaining technical or legal advice. It is anticipated that in most cases, the duration of the investigation will not exceed 20 working days. If the investigation is likely to take longer than 20 days, the Privacy Officer will notify the complainant.

4. Complaint Outcome

The Privacy Officer will write to the complainant to inform them of the outcome of the investigation.

If the complainant remains dissatisfied with the response provided, they may wish to contact the Office of the Australian Information Commissioner (The Privacy Commissioner). For more details, see <http://www.oaic.gov.au>.

5. Internal Feedback

Where appropriate, the Privacy Officer will provide feedback, including recommending process improvements, to the relevant internal stakeholders to ensure continued compliance with the Australian Privacy Principles.

Gail Ker - CEO

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Access Community Services Limited takes your privacy and confidentiality very seriously. The Cookie Policy is to be read in conjunction with the Privacy and Confidentiality Policy.

A cookie is a small file of letters and numbers which we put on your computer whilst you are browsing. These cookies allow us to distinguish you from other users of our website, helping us to provide you with a better experience during your visit and also allowing us to improve our site.

Our Cookie Use

Access Community Services Limited website uses cookies to remember a user's selection within our website, in order to tailor information specific to the user and also to ensure the same tailored information is provided to the user when revisiting the website.

Google Remarketing

We use cookies for remarketing purposes. These cookies are written by Google for the purpose of showing advertisements to users who have previously visited our site as they browse other websites on the internet. More information on Google Remarketing can be found [Google website](#).

Cookies set by Third Party sites

To support our site and the information we are posting, we sometimes embed photos and video content from websites such as YouTube and Flickr. As a result, when you visit a page with content embedded from, for example, YouTube or Flickr, you may be presented with cookies from these websites. Access Community Services Limited does not control the dissemination of these cookies. You should check the relevant third party website for more information about these.

Analytical Cookies

Analytical cookies allow us to recognise and count the number of visitors and see how visitors interact with the site. This enables us to ensure that users are finding the information that they are looking for more effectively.

If you wish to restrict or block the cookies which are set when visiting our website, or indeed any other website, you can do this through your browser settings. Please note that restricting cookies may impact on the functionality of the site and also your user experience.

Gail Ker - CEO

A handwritten signature in black ink, appearing to be "GK" or "Gail Ker", written over a horizontal line.