

Privacy Policy:

Data collection and information gathering is constrained by the Privacy Act 1988 (Cth) as outlined in the National Privacy Principles (NPPs) and Information Privacy Principles (IPPs). www.privacy.gov.au. These principles codify how personal information and data is gathered, stored, processed and disseminated by “organizations”. The Privacy Act is based on the “need to know” principle.

The RDA-RIVERINA will need to include a privacy notice to any form or documents where they ask for names and addresses for databases, newsletters etc. The notice will need to specify what the information is used for, where it will be directed i.e. further disclosure. All information may only be used for the reason that is advised, it cannot be used within the RDA-RIVERINA for any other application. See the RDA-Riverina Privacy Statement for further details.

[For the attention of individuals whose personal information may be collected by this organisation]

Purpose of the Policy

The RDA-Riverina takes its obligations under the Privacy Act seriously and will take all reasonable steps in order to comply with the Act and protect the privacy of the personal information that we hold. This policy sets out how we intend to so.

The personal information that the Organisation collects

The RDA-Riverina collects and holds the following personal information:

- Name
- Address
- Company
- Position
- Telephone numbers
- Facsimile number
- Email address

Why do we collect it?

The RDA-Riverina collects uses and discloses the information in accordance with the *Collection Statement*.

The information is collected to enable the RDA-Riverina to distribute information to the person/s on events pertaining to projects and activities that may be of relevance to the person/s, feedback on past events, to facilitate collaboration on future projects, and to assist the RDA-Riverina with reporting to the Minister on issues within the region.

Access to your personal information

The RDA-Riverina provides access to the personal information about you that we hold. Access will be provided in accordance with our *Access Policy*. If you require access to your personal information please contact the Executive Officer at RDA-Riverina@RDA-Riverina.org.au or phone 6964 5540.

Complaints

If you have any complaints about our privacy practices or wish to make a complaint about how your personal information is managed please contact the Executive Officer at RDA-Riverina info@rdariverina.org.au or phone 6964 5540. Complaints will be handled under the RDA-Riverina's *Privacy Complaints Policy*.

Storage

The RDA-RIVERINA will take all reasonable steps to protect the security of the personal information that we hold. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.

Contract

We **do not** contract out data storage or processing functions.

If the personal information was collected **not** from the customer but from another party, the RDA-RIVERINA will take reasonable steps to inform that individual of the Collection and provide the RDA-RIVERINA's Collection Statement.

Collection Statement

[When the RDA-Riverina collects the personal information collected]

The information is collected for the purpose of:

- providing you with our product
- offering you our services
- processing payments
- we may also collect the information to distribute brochures, information about forthcoming events that the RDA-Riverina will be holding in relation to projects and activities that may be relevant to the person/s, whose details we have collected.

The RDA-Riverina will usually disclose this information to:

Project Managers or proponents working on projects that may have relevance to the person/s.
Organisations preparing to have events in the region that may be of interest to the person/s.

What happens if you choose not to provide the information?

You are not obliged to give us your personal information. However, if you choose not to provide the RDA-Riverina with personal details eg name and address, we may not be able to provide you with the full range of our services, including brochures, information on relevant events and any other information that may be of assistance to you or your organisation.

You can gain access to the personal information about you, held by the RDA-RIVERINA. If you wish to do so please refer to our Access Policy or contact the Executive Officer info@rdariverina.org.au or [phone 02 6964 5540](tel:0269645540) or write to the RDA-Riverina, PO Box 8025, Griffith East NSW 2680.

Sources of information

Where possible the RDA-Riverina will collect the information directly from the customer.

If the personal information was collected not from the customer but from another party, the RDA-RIVERINA will take reasonable steps to inform that individual of the Collection and provide the above Collection Statement.

Collection and Usage Guide

Identify the purposes for which information is collected – an important exercise.

NPP 1, dealing with Collection, is a cornerstone Principle. In many respects it regulates and governs how other NPPs will apply to the personal information gathered by an organisation.

Similarly NPP 2, regulating Use and Disclosure, builds on the obligations created by NPP 1.

In order to ensure effective compliance with NPPs 1 and 2 it is important that organisations review closely the purpose(s) for collecting personal and sensitive information. This is important because:

1. The new privacy law requires that organisations use and disclose personal information for the primary (main) purpose for which it is collected. There are restraints on the use or disclosure of this information for secondary (other) purposes.
2. Information can only be used or disclosed for a secondary purpose if:
 - It can be shown that the secondary purpose is related to the primary purpose of collection;
AND
 - Affected individuals would have a *reasonable expectation* that the organisation would use or disclose the information for the secondary purpose: OR
 - Affected individuals have *consented* to the use or disclosure for the secondary purpose.

There are several exceptions in the Act where secondary uses are permitted without the need to show the above (see NPP 2.1(c)-(h)).

3. The purpose of collection may not only impact on how that particular organisation or business unit uses and discloses information, but also how a related body corporate can use and disclose the information.
4. In the case of **sensitive information**, the purpose of collection can significantly affect how the organisation should collect such information. Your organisation should try to ascertain how the core purpose of collecting any sensitive information directly relates to any other possible uses or disclosures of that sensitive information. Organisations that use and disclose sensitive information must note that in **addition** to the obligations set out in one above, they must illustrate that the secondary purpose is **directly** related to the primary purpose of collection.

So the first thing that your organisation really needs to do is identify the core or main purpose for collecting various types of personal information. It will then need to consider how the main purpose of collection of personal information may relate to any other purposes of collection. In other words, how the various uses or disclosures of that personal information by your organisation possibly relate to each other.

Example:

For a retailer, the main purpose for collecting information may be that the organisation needs the information to sell a particular product, or open an account of some kind. However, the retailer may also use the information to create a marketing database. It may in some cases pass the information on to its insurer.

Collection and Usage table

The table below enables you to check how these principles apply to your organisation. The exercise is designed to enable you to review and build on the understanding of NPPs.

1. Source of information	
2. Information collected	
3. Primary Purpose	
4. Other Purposes	
5. Reason not collect from individual	
6. Current disclosures (if any)	

Access Policy:

This policy is directed to those individuals whose personal information is held by the RDA-RIVERINA.

Purpose

The purpose of this Policy is to set out how the RDA-Riverina will provide access to your personal information. The Policy is part of our Privacy Policy and our desire to provide for, maintain and give effect to your right to privacy.

Overriding principles

At all times the conduct under this Policy will be governed by the following principles:

- All requests for access will be treated seriously
- All requests will be dealt with promptly
- All requests will be dealt with in a confidential manner
- Your request to access your personal information will not effect your existing obligations or effect the commercial arrangements between you and the RDA-Riverina.

Form of Access

The RDA-Riverina will provide access by allowing you to inspect, take notes of or receive copies or print outs of the personal information about you that the RDA-Riverina holds.

You can make your request in writing or by contacting the RDA-Riverina at RDA-infor@rdariverina.org.au or phone/fax 6964 5540.

To obtain access you will have to provide proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined.

When will Access be denied?

Access will be denied if:

- the request does not relate to the personal information of the person making the request;
- providing access would pose a serious and imminent threat to life or health of a person;
- providing access would create an unreasonable impact on the privacy of others;
- the request is frivolous and vexatious;
- the request relates to existing or anticipated legal proceedings
- providing access would prejudice negotiations with the individual making the request;
- access would be unlawful;
- denial of access is authorised or required by law;
- access would prejudice law enforcement activities;
- access discloses a '*commercially sensitive*' decision making process or information; or
- any other reason that is provided for in the National Privacy Principles (NPPs) set out under the Privacy Act.

Where possible, the RDA-Riverina will favour providing access. It may do so by providing access to the appropriate parts of the record or by using an appropriate '*intermediary*'.

Where there is a dispute about the right or forms of access these will be dealt with in accordance with the RDA-Riverina's *Grievance Policy*.

Time

The RDA-RIVERINA will take all reasonable steps to provide access within 30 days of your request. In cases where the request is not complicated or does not require access to a large volume of information, we will provide information within 14 days.

Privacy Complaints Policy:

How the RDA-RIVERINA will handle privacy complaints for individual customers

Introduction

The RDA-Riverina sees the importance of privacy to the organisation, its customers and other stakeholders. As such the RDA-Riverina is committed to protecting the privacy of the personal information that we hold. This is part of our organisation's:

- Legal obligations under the Privacy Act 1988
- Ethical and business obligations
- Service to you

The RDA-Riverina places high priority on effectively dealing with any complaints dealing about privacy that you may have.

- Overriding principles
- At all times the conduct under this policy will be governed by the following principles:
- All complaints will be treated seriously
- All complaints will be dealt with promptly
- All complaints will be dealt with in a confidential manner

The privacy complaint will not affect your existing obligations or the commercial arrangements that exist between this organisation and you.

Who may complain under this policy?

If you have provided us with personal information, you have a right to make a complaint, have it investigated and dealt with under this policy.

What is a privacy complaint?

A privacy complaint relates to any concern or dispute that you have with our privacy practices as it relates to **your** personal information. This could include matters such as:

- How personal information is collected
- How personal information is stored
- How this information is used or disclosed
- How access is provided.

What do I do if I have a complaint about privacy practices?

The RDA-Riverina resolves grievances at the local level if possible. If you have a complaint about privacy please contact the Executive Officer or Chairperson. All complaints will be logged on a database/complaints register.

You may complain orally or in writing. Usually your contact with the organisation will be the proper person to discuss or resolve your complaint, however, if your privacy complaint is not resolved then the matter will be referred to the RDA-RIVERINA Executive, the next level of management.

Grievance procedure

The goal of this policy is to achieve an effective resolution of your complaint within a reasonable set timeframe [28 days or as soon as practicable].

Once the complaint has been made, the point of contact can then resolve the matter in a number of ways:

Request further information and investigation: Your initial contact may request from you further information. You should be prepared to give as many details as possible including details of any relevant dates and documentation. This will enable the contact to investigate the complaint and determine an appropriate and useful solution. All details provided will be kept confidential.

The complaint may be investigated. The RDA-RIVERINA will try to do so within [72 hours/as soon as possible]. It may be necessary to contact others in order to proceed with the investigation and progress your complaint.

Discuss options: We will discuss options for resolution and if you have suggestions about how the matter might be resolved you should discuss these with your contact. The contact could also suggest other solutions or give examples of how the personal information can be revised or stored in a different way.

Refer to RDA-RIVERINA Executive: If your complaint is not resolved at the local level, it will be referred to the RDA-RIVERINA Executive. The Executive members will be provided with the history and may discuss the complaint with the employees, or other parties that are involved.

Resolution: You will be informed of the outcome and the reasons for the decision. If this does not resolve the complaint, the matter will be referred to a mutually agreed intermediary.

If after the above steps have been followed you are still dissatisfied with the outcome you may refer the complaint to the federal Office of the Privacy Commissioner.

Follow-up of the complaint [optional]

The RDA-RIVERINA Executive Officer will contact you after approximately six weeks to ensure that you have no further concerns.

Records

The RDA-RIVERINA will keep a record of your complaint and the outcome in its Complaints Register.

Anonymous complaints

The RDA-Riverina is unable to deal with anonymous complaints as we are unable to investigate properly and follow-up such complaints.

However, in the event that an anonymous complaint is received, the RDA-Riverina will note the issues raised and try and resolve them appropriately. For example, the RDA-RIVERINA may wish to conduct further training or provide assistance in a given area.

Information

For any further information about this policy please contact the RDA-RIVERINA Executive Officer.

Privacy Complaints Register

To be completed by the RDA-RIVERINA's Privacy Officer

Complaint Number	
Date	
Contact details of complainant	
Nature of complaint	
Summary of complaint	
Documentation received	
Action taken	
Further action required	
Outcome of complaint	

Privacy Statement to be used for Project Proponents

The RDA-RIVERINA's privacy policy complies with the National Privacy Principles (NPPs), established by the Privacy Act 1988. Your privacy is respected by the RDA-RIVERINA and all personal information will be handled in a sensitive manner.

Information collected on the project ideas, concepts and application forms will be used for the purpose of evaluating proponent projects and will be provided to RDA-RIVERINA project managers, members of the RDA-RIVERINA and Department Agency (Federal & State) staff.

Please note, that in considering your proposal for funding, the information detailed in this application may be shared with relevant Commonwealth, State and/or local government agencies, organisations and individuals, including those you identify in the application, to substantiate any claims or statements that you make, to verify the capacity of the applicant organisation to manage Commonwealth funds and for general comment on the viability of your proposal. Information of a pecuniary nature will be treated as confidential.

The proponent's name, contact details and project proposal information, if successful in obtaining funding will be provided to the media as part of a media release at the time ministerial announcement. These details will also be published in the RDA-RIVERINA's Annual Report and may be used to promote RDA-RIVERINA activities.

The proponent's name, project description and funding awarded will also be published on the RDA-RIVERINA's website so that the community at large will be able to benefit from the project's implementation.

If you do not provide all the information requested on the project application forms, the RDA-RIVERINA will be unable to process your application.

You are able to access and update the personal information, which we hold on record about you during business hours.

If you have any questions in relation to privacy, please contact the Privacy Officer on (02) 6921 1007, or in writing to the Privacy Officer, RDA-Riverina, PO Box 479, Wagga Wagga NSW 2650 or send an email to info@rdariverina.org.au

Website Statement

The RDA-RIVERINA's privacy policy complies with the National Privacy Principles (NPPs) established by the Privacy Act 1988. Your privacy is respected by the RDA-RIVERINA and all personal information will be handled in a sensitive manner.

When you visit this website, our Internet Service Provider (Webfront) logs your IP address and the pages accessed in a locked file on the website server. No attempt will be made to identify you or your browsing activities except, in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect the Internet Service Provider's logs.

This site contains links to other sites. The RDA-RIVERINA is not responsible for the privacy practices or the content of such websites.

We will only record your email address if you send us a message. Your email address will only be used for the purpose for which you have provided it and will not be added to any mailing lists. We will not use or disclose your email address for any other purpose, without your prior written consent.

This site does not provide facilities for the secure transmission of information across the Internet. Users should be aware that there are inherent risks transmitting information across the Internet.

Email Clause

The RDA-RIVERINA already has an email clause that sets out the users responsibility when using email.

Notice:

The information contained in this e-mail message and any attached files may be confidential information, and may also be the subject of legal professional privilege. If you are not the intended recipient any use, disclosure or copying of this e-mail is unauthorised. If you have received this e-mail in error, please notify the sender immediately by reply e-mail and delete all copies of this transmission together with any attachments.

If the RDA-RIVERINA intends to use an email list of contacts to distribute information, this should contain a Privacy Notice advising that:

“this email list was created for [specific purpose], is not to be used for any other purpose and is not for further distribution.”

The RDA-RIVERINA will also advise that anyone on the distribution list can be taken off by contacting the RDA-RIVERINA.

Disclosure of Personal Information Policy:

Introduction

Personal information concerning employees is confidential and will only be used for purposes for which the information is relevant.

Exceptions

Personal information may be used for purposes other than for which it was collected:

- with the consent of the person concerned;
- to prevent a serious threat to a person's health or life;
- as required or authorised by law;
- where reasonably necessary for the enforcement of criminal or revenue law.

Access

Employees have access to the personal information held by RDA-RIVERINA Inc about them. Employees in consultation with the Executive Officer may make corrections and additions to personal information to make sure that the information is accurate, up to date and complete.