

PRIVACY POLICY – FOR EXTERNAL USE/PRIVACY ACT COMPLIANCE

PRIVACY POLICY - THE COUNCIL OF SMALL BUSINESS ORGANISATIONS AUSTRALIA LIMITED (COSBOA)

Your privacy is important

This statement outlines the COSBOA's policy on how the COSBOA uses and manages personal information provided to or collected by it.

COSBOA is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

COSBOA may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to COSBOA's operations and practices and to make sure it remains appropriate to the changing legal environment.

What kind of personal information does COSBOA collect and how does the organisation collect it?

The type of information COSBOA collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- COSBOA staff including contact addresses and phone numbers, bank details, superannuation information.
- Grant applicants including tax returns, contact addresses and phone numbers, bank details, identity documents and criminal history checks.
- Board members including contact addresses and phone numbers.
- Stakeholder organisations: market intelligence and commercial-in-confidence information.

Policies can be established or altered only by the Board: **Procedures** may be altered by the CEO.

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Personal Information you provide:

COSBOA will generally collect personal information held about an individual by way of written requests for specific purposes which will be fully explained. You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

Personal Information provided by other people:

In some circumstances COSBOA may be provided with personal information about an individual from a third party, e.g. security vetting services.

In relation to employee records:

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to COSBOA's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between COSBOA and employee.

How will COSBOA use the personal information you provide?

COSBOA will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, COSBOA will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere we will still send you direct marketing information where you have consented and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

Job applicants, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, COSBOA's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which the COSBOA uses personal information of job applicants, staff members and contractors include:

- For insurance purposes;
- To organise payment of salary;
- To organise superannuation contributions
- For taxation purposes;
- to satisfy COSBOA's legal obligations.

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Where COSBOA receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

Volunteers:

COSBOA also obtains personal information about volunteers who assist the organisation in its functions or conduct associated activities, such as to enable COSBOA and the volunteers to work together.

Who might the COSBOA disclose personal information to?

COSBOA may disclose personal information about staff and contractors, including sensitive information held about an individual to:

- The Australian Taxation Office;
- Your superannuation fund;
- Authorised people providing human resources and payroll services to the COSBOA, and
- anyone you authorise COSBOA to disclose information to.

Sending information overseas:

COSBOA will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

How does COSBOA treat sensitive information?

In referring to 'sensitive information', COSBOA means:

“information relating to a person’s racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual”.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

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Management and security of personal information

COSBOA's staff are required to respect the confidentiality of personal information and the privacy of individuals.

COSBOA has in place steps to protect the personal information the organisation holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

Updating personal information

COSBOA endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by the COSBOA by contacting the Privacy Officer of the organisation at any time.

The Australian Privacy Principles and the Health Privacy Principles require COSBOA not to store personal information longer than necessary.

You have the right to check what personal information COSBOA holds about you.

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which COSBOA holds about them and to advise the organisation of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information COSBOA holds about you, please contact the Privacy Officer in writing.

COSBOA may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction.

How long will COSBOA keep my information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

Enquiries and privacy complaints

If you would like further information about the way COSBOA manages the personal information it holds, please contact the Privacy Officer. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Privacy Officer who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting then you can refer your complaint to the Office of the Australian Information Commissioner via:

- email: info@cosboa.org.au
- tel: (02) 9431 8646

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