PRIVACY POLICY

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1 Document Information

Business Unit	Legal and Governance
Document Type	Internal Governance Policy
Document Owner	Director of Legal and Governance
Approval Authority	CEO
Effective Date	18th November 2026
Review Schedule	2 years

2 Purpose and Objective

Housing Plus and Plus Community (or **we, us** or **our**) deals with information privacy in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles **(APPs)** set out in the Privacy Act.

This Privacy Policy sets out our policies in relation to management of personal information

3 Scope

a. This policy applies to all Employees, Management and Other Stakeholders including Volunteers of Housing Plus and Plus Community.
b. This policy describes the organisation's objectives and policies regarding privacy and collection of information from all stakeholders of Housing Plus, including (but not limited to) clients and employees.

4 References

1) Privacy Act 1988 (Cth)
2) National Standards: Australian Privacy Principles (APPs)
3) Privacy and Personal Information Protection Act 1998 (NSW)
4) NSW Standards: Information Privacy Principles (IPPs)
5) Artificial Intelligence (AI) Policy)
6) Record Retention Policy
7) Master Definitions

5 Responsibilities

5.1 Business Unit Directors

1) Understand and comply with relevant Housing Plus Group policies and procedures
2) Complete any mandatory training
3) Seek guidance from Policy Owner on policy adherence
4) Ensure adequate resources are provided to implement and support this policy
5) Manage the implementation of and adherence to this policy

5.2 Managers

1) Understand and comply with relevant Housing Plus Group policies and procedures
2) Complete any mandatory training
3) Seek guidance from Policy Owner on policy adherence
4) Ensure that all Employees are aware this policy and understand their obligations.
5) Ensure effective implementation of and adherence to this policy.

5.3 Employees

1) Understand and comply with relevant Housing Plus Group policies and procedures
2) Complete any mandatory training
3) Seek guidance from Policy Owner on policy adherence

6 Policy

6.1 What kinds of Personal Information we collect and store?

We collect and hold:

- Your contact details, such as office address, home address, telephone numbers and email address.
- Your personal details, such as date and place of birth, gender, qualifications, titles, whether or not you are Aboriginal or Torres Strait Islander, the languages you speak.
- Your employment details, such as your employment history, information relating to any complaints received and any disciplinary investigations or other action.
- Your browsing history on the Housing Plus and/or Plus Community website and our SharePoint intranet or apps downloadable on smartphones or tablets (together, the **Sites**).
- Any criminal record or medical information to the extent that it is relevant to our functions and responsibilities under and authorised by Housing Plus or Plus Community and the Community Housing Sector.
- Records of your communications and other interactions with us.

In this Privacy Policy we refer to this as your Personal Information.

6.1.1 Sensitive Information

We handle Sensitive Information with extra care and protection, and we only collect this information with your consent or when legally permitted. This includes:

Health information

- Medical history and health conditions relevant to the safe and appropriate delivery of housing and community services to you
- Treatment reports and clinical information provided to us by your health or support providers

Cultural and background information

- Racial or ethnic origin (to provide culturally appropriate services and to meet our obligations under relevant Commonwealth and State legislation)
- Whether you identify as Aboriginal or Torres Strait Islander (to provide culturally appropriate services and to fulfil our reporting obligations)
- Religious beliefs (where relevant to the delivery of services to you)

Employment screening

- Criminal record checks (where required to verify your background to engagement as an Employee or Volunteer)

6.2 How do we collect and hold your Personal Information?

We generally collect your Personal Information directly from you, including when you use the Housing Plus or Plus Community website or our SharePoint intranet or other apps downloadable on smartphones or tablets. However, in some cases, we may receive your Personal Information from a third party (for instance if we receive a complaint relating to your conduct) or when it is relevant to our statutory responsibilities (for instance other regulators or government entities who have dealt with you).

6.2.1 Cookies

Cookies are small text files stored on your device that:

- Help remember your preferences;
- Enable certain website functions; and
- Make your interactions with our website more efficient.

Tracking Pixels are tiny invisible images in web pages and emails that;

- Help us understand how you interact with our content
- Allow us to measure email engagement; and
- Enable more relevant content delivery.

How we use these technologies

Essential Functions

- Remember your login status;
- Maintain your session security;
- Store your preferences; and
- Enable core website features.

Analytics and Performance

- Understand how our website is used;
- Measure page views and traffic;
- Analyse user navigation patterns; and
- Identify areas for improvement.

Personalisation

- Remember your preferences;
- Tailor content to your interests;
- Improve your browsing experience; and
- Provide relevant recommendations.

Your control

You can manage these technologies by:

- Adjusting your browser settings to block or delete cookies;
- Using privacy-focused browser extensions; and/or
- Configuring your email client to block images.

Note: Blocking all cookies may affect website functionality and your user experience.

6.3 What would happen if we did not collect your Personal Information?

Without your Personal Information we may not be able to process your requests, perform our statutory functions or provide you with some or all of our products and services.

6.4 What are the purposes for which we collect and hold your Personal Information?

We collect and hold your Personal Information to:

1) Fulfil our functions and responsibilities under Commonwealth and State legislation and associated regulations (which require and authorise us to collect certain information) including:

- Maintaining regulatory and corporate records.
- Undertaking investigations and implementing disciplinary procedures associated with professional responsibility; and
- Providing information to Australian regulators and government entities and to overseas regulators where applicable.

2) Fulfil our role as a Community Housing Provider and a Community Services Provider and to uphold our charitable mission including:

- To provide services.
- To run Housing Plus and Plus Community's business and operations
- To communicate and manage our relationship with customers
- To assist employees in providing services to customers and assess eligibility for services and support for potential customers.
- For administrative requirements including updating and maintaining records, analysing data and providing information to Housing Plus' Insurers.
- To prevent or detect fraud.
- To provide information to law enforcement, legal advisors and government agencies at all levels.
- To provide information to Housing Plus and Plus Community's support partners and health providers who provide follow up and ongoing services to our customers.
- To comply with government and other reporting requirements that apply.

3) Analyse your interaction with our personal and electronic services. The information collected from you may be analysed individually and/or aggregated with the information relating to other members to produce statistical information. Insights from this process are used to select and optimise the communications, information and services we provide to you; and

4) Use information and/or provide information to third parties as authorised or required by law.

6.5 Use and Disclosure of your Personal Information

We do not use your Personal Information or disclose it to another organisation unless:

- It is reasonably necessary for one of the purposes described above;
- Having regard to the nature of the information or the circumstances of collection we believe you would expect us to use the information or make the disclosure;
- Required or authorised by law or court or tribunal;
- It is necessary to protect the rights, property, health or personal safety of the public or our interests, and it is unreasonable or impracticable to obtain your consent;
- The disclosure is necessary to assist any entity, body or person to locate a person who has been reported missing;
- We have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in, and we believe that the collection, use or disclosure is necessary in order for us to take appropriate action;
- The assets and operations of our business are transferred to another party as a going concern;
- It is necessary to obtain third party services, for example to carry out data analysis or provide information processing services. The use of your information by third parties is strictly controlled; or
- It is for one of the purposes expressly permitted under the Privacy Act.

6.5.1 Disclosure Overseas

We may disclose Personal Information to our contracted information technology service providers that are hosted offshore. Your Personal Information may also be accessed from or transferred to locations outside Australia when we work with overseas business partners.

Before disclosing your Personal Information overseas, we take reasonable steps to ensure that the recipient treats your Personal Information in accordance with applicable law by only sending what is necessary, requiring recipients to protect your Personal Information through contractual agreements which require the recipient to comply with the privacy standards in applicable law or through other mechanisms that provide comparable safeguards and by monitoring how recipients handle your Personal Information.

6.5.2 If you do not want your Personal Information to be disclosed

If you do not want your personal information to be disclosed (for instance, you want to have your name excluded from our mailing lists) you should advise us in writing. We will accommodate your request provided that the disclosure is not required by law

6.6 Storage and Security of Personal Information

We take all reasonable precautions to protect the Personal Information we hold from misuse, loss, unauthorised access, modification, or disclosure.

Where practicable we implement measures to require organisations to whom disclosure is made to comply with the Privacy Act. If a third party is given access to Personal Information, we take reasonable steps to ensure that the information is held securely and used only for the purpose of providing the relevant service or activity.

We hold Personal Information in both hard copy and electronic formats. Paper files are stored in secure cabinets onsite. They may also be archived in boxes and stored offsite in secure facilities.

You can also assist us in keeping your Personal Information secure by maintain the confidentiality of your account passwords and notifying us immediately if there is any unauthorised use of one of your accounts by another Internet user or any other breach of security relating to one of your accounts or your use of our websites.

The steps we take to secure the Personal Information we hold includes but is not limited to:

- Website protection measures (such as encryption, firewalls, and anti-virus software);
- Access restrictions to our computer systems (such as login and password protection);
- Restricted access to our office premises; and
- Staff training and implementation of workplace policies and procedures that cover access, storage, and security of information.

6.6.1 Retention of Personal Information

We keep your Personal Information only for as long as we need it for the purposes for which it was collected, or as required by law. This includes retaining your Personal Information to:

- Provide our services to you;
- Meet our legal, tax, accounting or regulatory obligations; and
- Handle any complaints or legal issues that may arise.

We may keep your Personal Information for longer periods if:

- You make a complaint that we need to investigate or respond to;
- We reasonably believe legal action involving our relationship with you might occur; and/or
- The law requires us to keep it for specific timeframes.

Once we no longer need your Personal Information, we will securely delete or destroy it in accordance with our Record Retention Policy and legal requirements. You can request

information about retention periods for your Personal Information and ask for early deletion where legally possible.

6.6.2 Artificial Intelligence, Automated Processing and Human-led Decision-making

We use AI and machine learning technologies in our operations and services, including AI tools provided by third parties such as our website chatbot. We only use these technologies when legally permitted and necessary for our business, and in line with our AI Policy

How we use AI

We may use AI technologies to:

- Conduct analysis and data processing;
- Generate and modify content and coding;
- Improve and optimise our services and operations;
- Automate routine tasks and communications;
- Personalise your experience with our services;
- Support quality assurance processes; and
- Assist with customer support and queries, including through our website chatbot.

Data protection and security

When we work with third-party AI providers, we ensure they handle your Personal Information in accordance with privacy laws through contractual requirements and appropriate safeguards.

Your rights and our commitments

Any information generated or inferred about you by AI technologies is treated as Personal Information, and you maintain all the rights outlined in this Privacy Policy.

Housing Plus will not rely solely on artificial intelligence, automated processing or other computer programs to make decisions on behalf of the organisation. These technologies may be used to support and inform decision-making; however, responsibility and accountability for decisions will remain with appropriately authorised people.

Where a decision could reasonably be expected to significantly affect an individual's rights or interests, including their eligibility for services or opportunities, AI or automated processing may provide inputs to the decision-making process, but the decision will be subject to appropriate human review and determination.

When using AI, automated processing or other computer programs with your Personal Information, we commit to the following:

Transparency and control

- Where Housing Plus uses your Personal Information in the operation of a computer program to make, or undertake processing that is substantially and directly related to making, a decision that could reasonably be expected to significantly affect your rights or interests, we will be transparent about that use in accordance with the Australian Privacy Principles.
- Where applicable, this Privacy Policy will describe:
    - the kinds of Personal Information used in the operation of such computer programs;
    - the kinds of decisions made solely by the operation of such computer programs; and
    - the kinds of decisions for which a computer program undertakes processing that is substantially and directly related to making the decision.
- We will maintain appropriate human oversight and review where AI or automated processing is used to support a decision that could significantly affect an individual's rights or interests.
    - Our staff are trained to understand AI limitations and verify outputs before relying on them
    - We implement processes to verify the accuracy of AI-generated outputs
- Security
    - We use appropriate technical and organisational measures to maintain the security and integrity of your Personal Information
    - We regularly test and monitor AI outputs for accuracy and reliability
- Risk mitigation
    - We regularly assess and document risks associated with using AI to process your Personal Information
    - We implement appropriate measures to address these risks
    - We continuously monitor AI performance and regularly review their impact
    - We will review our use of AI, automated processing and other computer programs as our technologies and business processes evolve. We will update this Privacy Policy, relevant collection notices and associated governance arrangements where required.

6.7 Linked Websites

This Privacy Policy does not apply to linked websites. Links to third party websites that are not operated or controlled by Housing Plus or Plus Community are provided for your convenience. We are not responsible for the privacy or security practices of those websites. Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any Personal Information to them.

6.8 Access and Corrections to your Information

You have the right to access your Personal Information unless we are permitted by law to withhold that information. Any requests for access to your Personal Information should be made to Housing Plus Privacy Officer (see "Contacting Us" heading below) in writing.

We will take reasonable steps to correct your Personal Information if we are satisfied that it is inaccurate, out of date, incomplete, irrelevant, or misleading. If we have provided your personal information to third parties, we will also notify them of the correction if you ask us to do so, unless it is impracticable or unlawful.

Requests to access and correct your information should be made by email, post or phone using the details provided under the 'Contacting Us' heading. Please note that we will need to verify your identity before processing your request. We will endeavour to respond to your request within 30 days.

If we do not agree with your request to access or correct your information, we will provide you with written reasons for our decision and available complaint mechanisms

6.9 Complaints and Further Information

If you require any further information about our management of Personal Information or have a complaint about our handling of your Personal Information, you should write to the Housing Plus and Plus Community Privacy Officer, who will respond to you within a reasonable time, usually 30 days.

If you are not satisfied with the outcome of your complaint you may contact us further to advise of your concerns and, if we are unable to reach a satisfactory resolution you may write to the Office of the Australian Information Commissioner (OAIC) at https://www.oaic.gov.au/privacy/privacy-complaints/ or the Information and Privacy Commission NSW at https://www.ipc.nsw.gov.au/ .

6.10 Contacting Us

All privacy related contact should be through the Housing Plus and Plus Community Privacy Officer. You can contact the Privacy Officer in the following ways:

- In writing to:

Attn: Privacy Officer – Housing Plus

Mail: PO Box 968 ORANGE NSW 2800

or

Attn: Privacy Officer – Housing Plus

Email: info@housingplus.com.au

- Via phone:

Telephone: 02 6360 3300 and ask to speak with our Privacy Officer.

6.11 Amendments

We may update this policy at any time by posting the revised version on our website. We recommend that you review our website regularly to stay current with any policy changes.

7 Training

7.1 New Staff Training

All Directors, Employees and Volunteers must read this policy and satisfactorily complete the Privacy Training Module within 3 weeks of commencing their role with Housing Plus.

7.2 Recurrent Training

All Directors, Employees and Volunteers must satisfactorily complete the Privacy Training Module on a 2 yearly basis or on instruction.

7.3 Special Training

All Directors, Employees and Volunteers must satisfactorily complete additional Privacy training where there are major changes in policy and procedure. Where there is a breach in the Privacy Policy and/or Procedure, the involved individual may be required to undertake additional training.

8 Version History

Version #	Policy Owner (NAME)	Approval Date	Approved By (NAME)	Amendments (if relevant)
1.0	Anthea Basha	25 November 2021	BOD	
1.1	Anthea Basha	November 2023		Reviewed
1.2	Anthea Basha	October 2024	GSC	Reviewed
1.3	Anthea Basha	18 November 2026	Maria Woods	Updated and AI added

9 Definitions

*To be read in conjunction with the **Master Definitions** document.*

Term	Definition
Personal Information	information or an opinion about an identified individual, or an individual who is reasonably identifiable: • Whether the information or opinion is true or not; and • Whether the information or opinion is recorded in a material form or not.
Sensitive Information	Sensitive information is a subset of personal information and includes: • Racial or ethnic origin; • Political opinions; • Religious beliefs or affiliations; • Sexual preferences or practices; • Criminal records; or • Health information about an individual.
Notifiable Data Breach	A data breach that is likely to result in serious harm to any individuals to whom the information relates.