

Privacy Policy and Procedures



**COMPLETE BUSINESS
SOLUTIONS AUSTRALIA**

Purpose

This policy and associated procedures are designed to ensure that Complete Business Solutions Australia (CBSA) collects, stores, secures personal information it holds on individuals to meet the legal requirements of the Australia Privacy Act 1988 and its associated Australian Privacy Principles:

- APP 1 — Open and transparent management of personal information
- APP 2 — Anonymity and pseudonymity
- APP 3 — Collection of solicited personal information
- APP 4 — Dealing with unsolicited personal information
- APP 5 — Notification of the collection of personal information
- APP 6 — Use or disclosure of personal information
- APP 7 — Direct marketing
- APP 8 — Cross-border disclosure of personal information
- APP 9 — Adoption, use or disclosure of government related identifiers
- APP 10 — Quality of personal information
- APP 11 — Security of personal information
- APP 12 — Access to personal information
- APP 13 — Correction of personal information

Policy

1. Privacy Principles

- In collecting personal information, CBSA complies with the requirements set out in the Privacy Act 1988, including the Australian Privacy Principles (APPs).
- Personal information, including sensitive information, is only collected from individuals in order that CBSA can carry out its business functions. CBSA only collects and stores information that is directly related to its business purposes and legal purposes.
- CBSA ensures each individual:
 - Knows why their information is being collected, how it will be used and who it will be disclosed to.
 - Is made aware of any legal requirement for CBSA to collect the information.
 - Is able to access their personal information upon request.
 - Does not receive unwanted direct marketing.
 - Can ask for personal information that is incorrect to be corrected.
 - Can make a complaint about CBSA if they consider that their personal information has been mishandled.

- Is made aware of any consequences for not providing the information requested.
- Whether the information is likely to be disclosed to overseas recipients, and if so, which countries such recipients are likely to be located in.

2. Collection of information

- In general, personal information will be collected through online surveys, training records, business documents, financial interactions, and other online forms and submissions.
- The types of personal information collected include:
 - Personal information and contact details
 - Business details including number of employees, contact information, and other background information
 - Financial information for billing
 - Interaction notes and support requests
 - Internal employee information
 - Contract and SLA information.

3. Storage and use of information

- CBSA will store all records containing personal information securely and take all reasonable security measures to protect the information collected from unauthorised access, misuse or disclosure. Personal information will be stored electronically to which only authorised staff have access.
- The personal information held about individuals will only be used by CBSA to enable efficient administration of services provided, reporting data to provide information about trends and opportunities, and to maintain accurate and detailed records of business interactions and outcomes.
- CBSA may use the personal information provided by an individual to market other internal services to them. An individual may opt out of being contacted for marketing purposes at any time by contacting our office. Information will not be passed onto any third-party marketing companies without the prior written consent of the individual.

4. Disclosure of information

- CBSA will not disclose an individual's personal information to another person or organisation unless:
 - They are aware that information of that kind is usually passed to that person or organisation.

- The individual has given written consent.
- CBSA believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious threat to the life or health of the individual concerned or another person.
- The disclosure is required or authorised by, or under, law.
- The disclosure is reasonably necessary for the enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of public revenue.
- Any person or organisation to which information is disclosed is not permitted to use or disclose the information for a purpose other than for which the information was supplied to them.
- Personal information may be used or disclosed by CBSA for statistical, regulatory and research purposes

5. Access to and correction of records

- Individuals have the right to access or obtain a copy of the information that CBSA holds about them including personal details, contact details, and any other information.
- Requests to access or obtain a copy of the records held about an individual must be made by contacting our office using the Request to Access Records Form. The individual must prove their identity to be able to access their records.
- There is no charge for an individual to access the records that CBSA holds about them; however, there may be a charge for any copies made. Arrangements will be made within 10 days for the individual to access their records.

6. Complaints about privacy

Any individual wishing to make a complaint or appeal about the way information has been handled within CBSA can do so by following CBSA's Complaints and Appeals Policy and Procedure.

Procedures

1. Privacy notices

- The Privacy Policy and Procedures will be accessible on CBSA's website.
- Ensure a privacy notice and declaration are included on other forms that may be required to collect personal or sensitive information from individuals, and that these are only used in compliance with clause 1 of this policy.

2. Email marketing

Ensure all marketing emails include an opt-out option.

3. Request to access records

- Individuals may request to access their records by using the Request to Access Records Form. Written requests should be sent to the Governance Manager.
- Requests may be from past or current clients or other individuals.
- Upon receiving a completed form, confirm the request is valid and has been made by the individual to which the records relate – check identification documents.
- Arrangements for provision of records should be made as suitable – mailing copies, providing a time for records to be viewed etc.
- Arrangements should be made verbally and confirmed in writing within 10 days of receiving the request.
- Where records are to be mailed, they should only be mailed to the address that is held on file for that individual, unless alternate change of address information is provided along with proof of identity – such as a driver's license or utility bill.
- Where records are to be shown to an individual, the student must produce photo ID prior and this should be matched to the records held on file about the individual to confirm they are only viewing their own records.
- Keep a note on how the records were accessed on the individuals file.

4. Amendment to records

- When an individual request is made for an incorrect record held about them to be corrected, they can do so by filling in an Amendment to Records Request Form.
- If it is a change of address or contact details of a current client, they can use the Change of Details Form.
- Upon receipt of a request form, consider whether the records held are correct or not. If the request is valid and records are incorrect, update records accordingly.
- Do not update records if they are found to be correct already.
- Advise the individual accordingly of the actions taken to follow up their request.

Related Documents

The following are related to this policy and procedure:

- CF002 – Complaints and Appeals Policy and Procedure
- FM002 – Request to Access Records Form
- FM003 – Amendment to Records Request Form
- FM004 – Change of Details Form

Document Control

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