

POLO1 - Information Privacy Policy

Organisation	Records Solutions	
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DOCUMENT HISTORY

Date	Author	Comments
20/12/2004	Greg Stevens	Policy ready for distribution
16/11/2007	Sandra Ennor	Policy reviewed and ready for distribution
05/02/2010	John Sim	Policy reviewed and new company details entered
07/02/2015	Lesley Hay	Review and reformat to new Records Solutions Branding
06/01/2022	Nancy Taia	Annual review
23/02/2024	Nancy Taia	Review and rebranding

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POLO1 - Information Privacy Policy



POLICY SCOPE

Records Solutions are committed to complying with the <u>Privacy Act 1988</u>, and the privacy provisions of all applicable subsequent amendments.

This policy applies to all employees and contractors employed by Records Solutions.

This privacy policy covers all personal information held by Records Solutions, that is, information, or an opinion, about an individual, whose identity is apparent, or can be reasonably ascertained, from that information or opinion. This includes information collected from people over the phone and over the internet by Records Solutions.

This policy also covers personal information that Records Solutions has sourced from third parties.

DEFINITIONS

Term	Meaning	
Individual	A natural person	
Personal Information	Information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion	
NPPs	National Privacy Principles: a set of principles that regulate the handling of personal information	
Sensitive Information	 Information or an opinion about an individual's: Race or ethnic origin Political opinions Membership of a political association Religious beliefs or affiliations Philosophical beliefs Membership of a professional trade association Membership of a trade union Sexual preferences or practice Criminal record 	

POLICY STATEMENT

A general statement outlining Records Solutions' position on the handling of personal information (Refer to Appendix A) will be used at all points of collection. This will include Records Solutions website, advertising material, standard forms and correspondence requesting personal information.

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Forms collecting information that are to be used for a specific purpose will include a privacy statement on the form including the purpose of collection.

Records Solutions Director/Principal Consultant will endorse all privacy statements and policy amendments.

PRIVACY PRINCIPLES

In line with the National Privacy Principles (NPP) and Privacy Guidelines (refer to the Office of the Federal Privacy Commissioner website - www.privacy.gov.au), Records Solutions will manage personal information as outlined below:

Collection - NPP 1

Records Solutions will only collect personal information that is necessary for one or more of its functions or activities.

Records Solutions will collect personal information only by lawful and fair means and not in an unreasonably intrusive way.

Records Solutions will advise individuals, where possible, of the purposes for which their personal information is being collected, and of those third parties to whom the information is usually disclosed.

Records Solutions will also take reasonable steps to ensure that the individual is aware of:

- The identity of Records Solutions and necessary contact details
- The fact that he or she is able to gain access to the information
- Any law that requires the information to be collected
- The main consequences (if any) for the individual if all or part of the information is not provided (for example, withholding certain information may limit our ability to inform students of future courses or inform employees of new company processes)

If it is reasonable and practicable to do so, Records Solutions must collect personal information about an individual only from that individual.

If Records Solutions collects personal information about an individual from someone else, it must take reasonable steps to ensure that the individual is or has been made aware of the matters (listed in subclause 1.3 of the *Privacy Act 1998*) except to the extent that making the individual aware of the matters would pose a serious threat to the life or health of any individual.

Sensitive information (as defined in the *Privacy Act 1998*) will only be collected where the individual has consented, or collection is required or permitted by law. All sensitive information collected will be treated securely and confidentially and only used for the purpose it was collected.

Use and Disclosure - NPP 2

Records Solutions will not use or disclose information about an individual other than for the primary purpose for which it was collected unless one of the following applies:

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- It is for a related secondary purpose that the individual would reasonably expect
- Where we have the consent of the individual to do so
- As required or permitted by the *Privacy Act 1998* or any other legislation.

Data Quality - NPP 3

Records Solutions will take reasonable steps to ensure that all personal information collected, used, or disclosed is accurate, complete, and up to date.

Data Security - NPP 4

Records Solutions will take all reasonable measures to prevent misuse or loss or unauthorised access, modification, or disclosure of personal information.

Personal information will be managed confidentially and securely and destroyed or archived or permanently de-identified in accordance with relevant legislation.

Openness - NPP 5

Records Solution's Information Privacy Policy will be available on our website and/or upon request.

Access and Correction - NPP 6

Individuals have a right to request access to any personal information held about them and may request any incorrect information to be corrected.

Records Solutions will only disallow access to personal information in accordance with the exemptions contained within the *Privacy Act 1998*.

Identifiers - NPP 7

Records Solutions will not assign, adopt, use, disclose or require unique identifiers from individuals except for the course of conducting normal business or if allowed or required by law.

Anonymity - NPP 8

Records Solutions will, where it is lawful and practicable to do so, give individuals the option of not identifying themselves when entering transactions with our company. If individuals take the option to not identify themselves, they will be informed of all, if any, limitations of services to be provided.

Transborder Data Flows - NPP 9

Records Solutions will only transfer personal information outside of Australia in accordance with the National Privacy Principles.

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Sensitive Information - NPP 10

Records Solutions will not collect sensitive information unless the individual has consented, or collection is required or permitted by law.

AUTHORITY/ACCOUNTABILITY

The responsibility for the design, maintenance and review of the policy will be delegated by the Director/Principal Consultant of Records Solutions.

Any final draft policy or policy changes will be submitted to the Director/Principal Consultant of Records Solutions for approval.

Once approved it will be the responsibility of the delegated officer to advertise the new or adjusted Policy to employees of Records Solutions.

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