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<b>Policy and Procedure Title</b>	<b>Privacy</b>

## 1 POLICY STATEMENT

ConnectGV is committed to maintaining ethical operations at all times, adhering to relevant legislation, regulations, and internal policies and procedures. We recognise the importance of your privacy. This document outlines how we safeguard your privacy and handle your personal information. It applies to everyone who interacts with us, including our staff and employees.

## 2 PRINCIPLES

The principles guiding ConnectGV's Privacy Policy and Procedure ensure ethical handling of personal information, consistent with legal and organisational standards:

**Compliance:** Adhering to relevant legislation, regulations, and policies.

**Ethical Standards:** Maintaining high ethical standards in all operations and interactions.

**Transparency:** Being open and clear about how personal information is collected, used, and managed.

**Accountability:** Holding all stakeholders responsible for adhering to privacy policies and procedures.

**Flexibility:** Adapting to changes in legislation, technology, and organisational needs.

**Efficiency:** Streamlining processes to handle personal information effectively and securely.

**Safety:** Ensuring the protection of personal information from unauthorised access, use, or disclosure.

## 3 OBJECTIVES

The objectives of the ConnectGV Privacy Policy and Procedure are to protect privacy, ensure compliance, promote transparency, provide control, maintain trust, support informed decisions, enhance security, facilitate accountability, and encourage feedback, ensuring ConnectGV operates with integrity, respects individuals' privacy, and complies with legal standards.

## 4 DEFINITIONS

**Consent:** Refers to your permission, which can be explicit or implicit. Explicit consent can be given in writing (e.g., by signing a form) or verbally (e.g., over the phone or in a face-to-face conversation). Implicit consent is inferred when it is reasonable to conclude you have given permission through your actions or inaction. For instance, if you have previously received information about a fundraising appeal and have not opted out, it is assumed you consent to receive future fundraising communications.

**Health Information:** Refers to information or opinions about an individual's physical, mental, or psychological health at any time; any disability; the individual's expressed wishes about future health services; health services provided or to be provided to the individual; other personal information collected in providing health services; and genetic information that could predict the individual's health.

**Person We Support:** Refers to an individual who is currently receiving, has previously received, or has inquired about services from us.

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**Personal Information:** Refers to information about you where your identity is clear or can be reasonably determined (e.g., your name, address, phone number, date of birth). This does not include de-identified information (e.g., data on the number of people using a service without revealing individual identities).

**Sensitive Information:** A subset of personal information that includes health or medical information.

**ConnectGV, We, or Us:** Refers to ConnectGV and any subsidiaries of ConnectGV, such as Billabong Garden Complex, Billabong Flowers, Billabong Rags, Billabong Lawns & Gardens.

**Unsolicited Personal Information:** Personal information received without any active effort to collect it. Examples include misdirected mail, unsolicited correspondence, unsolicited employment applications, and promotional flyers containing personal information sent by individuals promoting their business or services.

**Cookie:** A small text file placed on your computer by a web server when you access a website. Cookies identify the computer used, not the individual user.

## 5 CONTEXT

This policy and procedure applies to all staff, volunteers, contractors, students, participants, their families and customers.

## 6 RESPONSIBILITIES

The Accountable **Executive Manager** (or their delegate) is responsible for the effective implementation of this Policy and Procedure and for ensuring it remains up-to-date and accurate according to business, contractual, legal, or regulatory requirements, in alignment with governance policies.

**Managers/Leaders** are responsible for ensuring adherence to this policy and procedure.

**Employees, contractors, students, and volunteers** are responsible for complying with this policy and applying its requirements in their daily work.

## 7 PROCEDURE

### COLLECTION OF YOUR PERSONAL INFORMATION

#### What kind of personal information do we collect and hold?

The type and amount of personal information we collect and hold about you vary based on your interactions with us.

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**If you are a member or supporter of ConnectGV, the information we may hold includes:**

- Your name, address, telephone, and email contact details.
- Your gender and date of birth.
- Records related to your membership, including renewal and billing information.

**If you are a person we support or are connected to a person we support (e.g., family member, carer, advocate, or nominated representative), the information we may hold includes:**

- Your name, address, telephone, and email contact details.
- Your gender, date of birth, and marital status.
- Information about your disability and support needs.
- Health and medical information.
- Information about your preferences and needs (e.g., likes and dislikes, living arrangements, educational needs, daily routine, employment and life goals, social activities).
- Your visual image (photographs or otherwise).
- Information obtained from the National Disability Insurance Scheme.
- Your Medicare number and other government identifiers.
- Financial information.
- Records of interactions with our employees.
- Information about the services you are funded to receive and the supports you are using.
- Information about the services we provide to you, including outcomes and/or goals and billing details.

**If you are an employee, job applicant, or volunteer, the information we may hold includes:**

- Your name, address, telephone, and email contact details.
- Your gender and date of birth.
- Your tax file number and other government identifiers.
- Information about your qualifications, training, and work history.
- Information from police checks, working with children checks, and your right to work in Australia.
- Records related to your volunteer work with us.

**If you are a donor, corporate partner, or connected with us through our fundraising, marketing, or community access activities, the information we may hold includes:**

- Your name, address, telephone, and email contact details.
- Details of donations, bequests, and contributions you have made.
- Events and activities you have participated in.
- Publications and services you have received from us.
- Your billing details.

**If you use our websites, the information we may hold includes:**

- Your name, address, telephone, and email contact details.
- Details you provide through the website, such as registering for a mailing list or sending messages.
- Details provided during payments or donations via the website.

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**If you are a customer of our nursery or social enterprise businesses, the information we may hold includes:**

- Your name, address, telephone and email contact details, date of birth.
- Identification information including driver’s licence number
- Details of purchases and orders from us
- Financial information, including bank account details and credit card details, and information about your credit history
- Images from video surveillance and other cameras in our store.

If you do not fall into one of these categories, we generally do not hold your personal information.

**Do we collect sensitive information?**

We understand the importance of protecting your sensitive information. To provide our services or respond to inquiries, we may need to collect and hold sensitive information, including health and medical information and details about your disability and support requirements, with your consent. You can withdraw or amend your consent at any time by contacting us. We will limit the collection of sensitive information to the minimum necessary to provide our services.

**Your health information**

Protecting your health information is a key priority. When we collect and store your health information, we ensure you are aware of what information we hold, its full scope, and its purpose. You can access and correct your information at any time and instruct us to provide it to another health provider if needed.

**How do we collect personal information?**

We may collect personal information in various ways, including:

- When you inquire about or apply for our services.
- When you apply for employment or a volunteer role.
- When you contact us in person, by phone, mail, email, or online.
- When you receive services and supports from us.
- When you donate or participate in our fundraising activities.
- Through our direct marketing activities and contracted service providers.

Where possible, we collect information directly from you or your representatives. However, we may need to collect information from other sources, such as other service providers or funding agencies, to manage and coordinate supports. If we collect information from a third party without clear consent, we will take steps to inform you of the collection and its purposes.

If you provide us with information about another person, you must inform them of this, their right to access their information, and how ConnectGV will handle their information according to our Privacy Policy.

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**Unsolicited personal information**

Sometimes we receive personal information we did not request. If we could have lawfully collected this information for an allowed purpose, we will handle it like solicited information. If we should not have lawfully collected it, we will destroy or de-identify it if lawful and reasonable. Personal information provided beyond what we requested will be treated as unsolicited information.

**If you do not provide your personal information**

If you do not provide requested personal information, we may be unable to provide the information, services, or supports you are requesting.

**USE OF YOUR PERSONAL INFORMATION**

**Why does ConnectGV need your personal information?**

The purposes for collecting, holding, using, or disclosing your personal information depend on your interactions with us.

**If you are a member or supporter of ConnectGV, we may use your information to:**

- Process and manage your membership.
- Comply with laws and corporate governance requirements.
- Send you information about our services, events, research, and fundraising activities.
- Conduct surveys, research, and analysis.
- Invite you to participate in research projects.
- Encourage further involvement, seek donations, and for direct marketing.

**If you are a person we support or are connected to a person we support, we may use your information to:**

- Provide information about our services.
- Administer services and supports.
- Process payments and respond to inquiries.
- Conduct quality assurance and internal functions.
- Resolve complaints and comply with laws and regulations.
- Report to funding and government agencies.
- Send you information about our activities and invite you to research projects.
- Encourage further involvement, seek donations, and for direct marketing.

De-identified information may be used for research, evaluation, quality assurance, and education. Contact us if you do not wish for your de-identified data to be used this way.

**If you are an employee, job applicant, or volunteer, we may use your information to:**

- Process and manage your recruitment.
- Comply with laws and corporate governance requirements.
- Send you information about our activities.
- Conduct surveys, research, and analysis.
- Encourage further involvement, seek donations, and for direct marketing.

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**If you are a donor, corporate partner, or connected with us through fundraising, marketing, or community access activities, we may use your information to:**

- Process donations and payments.
- Manage our relationship with you.
- Respond to inquiries and resolve complaints.
- Conduct quality assurance and internal functions.
- Comply with laws and report to government agencies.
- Send you information about our activities and invite you to research projects.
- Encourage further involvement, seek donations, and for direct marketing.

De-identified information may be used for research, evaluation, quality assurance, and education. Contact us if you do not wish for your de-identified data to be used this way.

**If you use our websites, we may use your information to:**

- Personalise your website visit and enable remarketing.
- Respond to inquiries and process donations.
- Provide requested goods and services.
- Resolve complaints and conduct research.

**Direct marketing, support communications, and feedback invitations**

We may use your personal information to send marketing material, supporter communications, and feedback invitations. You will have the opportunity to opt-out of receiving such information. If you do not opt-out, we assume consent for future communications. If you do not wish to receive these communications, please contact us.

**Who does ConnectGV disclose your information to?**

To operate efficiently and provide services, we may disclose your personal information to third parties, including (but not limited to):

- Related and affiliated organisations.
- Service providers/suppliers acting on our behalf.
- Government and regulatory bodies.
- Your nominated representatives and legal advisors.
- Lawyers, auditors, banks, and other advisors.
- Entities required by law, such as the police, Coroner, the NDIS or Disability Services Commissioner.

In the event of unauthorised access, disclosure, or loss of your personal information, we will investigate and may notify you and the Office of the Australian Information Commissioner (OAIC). We take steps to ensure external organisations protect your privacy in accordance with this Privacy Policy. We will not sell your personal information.

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**Will your personal information be transferred offshore?**

Our technology infrastructure primarily uses cloud infrastructure or servers located within Australia, but occasionally we may use offshore platforms or services. By providing your personal information or using our services, you consent to this transfer. You can withdraw or amend your consent at any time. If we transfer information offshore for other purposes, we will do so with your consent or in accordance with Australian law. We ensure offshore recipients comply with the Australian Privacy Principles or similar privacy schemes unless you consent, or the law requires it. Contact us with any queries or objections.

**How do we store personal information and for how long?**

We take steps to ensure your personal information is securely stored and protected, including password protection, locked cabinets, and restricted access. However, we cannot guarantee unauthorised access will not occur. We keep your personal information as long as needed for its collected purposes and legal requirements. Personal information collected on non-ConnectGV devices (e.g., staff member’s personal phone) will be transferred to ConnectGV’s systems and removed from personal devices. When no longer needed, we will destroy or de-identify your information in accordance with our legal obligations and policies.

**ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

**How can we keep your personal information up to date?**

We take steps to correct personal information we hold. Inform us of any changes to your personal information.

**How can we keep your personal information up to date?**

We take steps to correct personal information we hold. Inform us of any changes to your personal information using our provided contact details. You can request access to and correction of your personal information. If requested, we will provide a copy of your personal information. If corrections are needed, we will make those corrections.

If we refuse your request, we will inform you of the refusal and provide reasons. You may contact us if you disagree with the refusal or want to discuss it further. If we correct your information, we will inform you of the correction.

**How to make a complaint**

If you believe we have breached your privacy or the Australian Privacy Principles, contact us using the details provided. We take privacy seriously and will address your complaint promptly and fairly. If you are not satisfied with our response, you may contact the OAIC.

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## CONTACTING CONNECTGV

For any questions, concerns, or requests regarding this Privacy Policy or your personal information, please contact us:

**Chief Executive Officer**  
**ceo@connectgv.com.au**  
**5821 2466**  
**12-16 Bowenhall Street, Shepparton, Victoria 3630**

## 8 REFERENCES

NDIS Practice Standards and Quality Indicators  
 Privacy Act 1988 (Cth)  
 National Disability Insurance Scheme 2013

## 9 LEGISLATION

Privacy Act 1988 (Cth)  
 Information Privacy Act 2000  
 Privacy and Data Protection Act 2014  
 National Disability Insurance Scheme 2013  
 Freedom of Information Act 1982 (Vic)  
 Health Records Act 2001 (Vic)

## 10 STANDARDS

The NDIS Practice Standards and Quality Indicators.

## 11 RELATED POLICIES / DOCUMENTS

Risk Management Policy  
 Code of Conduct  
 Conflict of Interest Policy and Procedure  
 Access to Personal Information Policy and Procedure

<b>Author</b>	Chief Executive Officer
<b>Accountable Reviewer</b>	Chief Executive Officer
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## Revision History

Version	Approved	Approval Date	Changes Made	Committee/ Board	Document Section
1	Approved	26/6/2024		Board	Governance