

## HR 1.1 PRIVACY POLICY

### 1. Purpose

This privacy policy explains how Common Equity NSW Ltd (ABN 39 861 993 468) (CENSW, we, our or us) collects, stores, uses and discloses your personal information.

### 2. Scope

We are committed to managing your personal information in accordance with the Privacy Act 1988 (Cth) and in line with CENSW's values, particularly our core value of integrity. In addition, and where applicable, we manage your personal information in compliance with other privacy related legislation such as the Health Records and Information Privacy Act (NSW) and the Privacy and Personal Information Protection Act 1988 (NSW).

### 3. Definitions

**As defined by the Office of the Australian Information Commissioner:**

**3.1 Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable whether:

- (a) the information or opinion is true or not; and
- (b) the information or opinion is recorded in a material form or not.

**3.2 Sensitive Information** is a subset of personal information and includes information or an opinion about a person's:

- i. racial or ethnic origin
- ii. political opinions or associations
- iii. religious beliefs or affiliations
- iv. philosophical beliefs
- v. trade union membership
- vi. sexual orientation or practices
- vii. criminal records
- viii. health information or genetic information
- ix. biometric information used for the purpose of identification

### 4. Policy

#### 4.1 Types of Personal Information we collect

The type of information we collect varies depending on the type of interaction you have with us. This may include:

- a. identification and contact information, such as, your name, address and/or email
- b. demographic information
- c. next of kin
- d. images (digital or photographs, including CCTV footage)
- e. some biometric information (for employees to log on to their work devices)
- f. your financial information
- g. education qualifications
- h. criminal records
- i. Government identifiers such as Centrelink customer reference number, device id, device location, IP address and browsing history
- j. and other information provided to us by you or via our website.

We may also collect sensitive information such as:

- a. ethnic and cultural information
- b. sexual orientation or gender identity
- c. religious beliefs
- d. health information.

#### **4.2 How do we collect personal information**

We generally collect personal information directly from you or, where you authorise us, from a person notified by you or through the Centrelink Confirmation Services and associated services (CCeS). We collect personal information by several means including via electronic communication with us or when you send us hard copies of documents or provide information by phone, face to face meetings, attend one of our training sessions or supply goods or services to us. We may also collect your personal information when you participate in our surveys or events, through our recruitment process and/or when you interact with our website.

We may obtain your personal information from third parties such as recruiters, other community housing providers, translators, cooperatives with whom we have partnership agreements, from our contractors and suppliers and from other third parties such as your employment referees or through the Centrelink portal.

#### **4.3 What happens if we cannot collect personal information**

You are not required to provide your personal information to us. However, if you do not provide your personal information to us, we may be unable to process any applications submitted to us (including in relation to your employment with us, or for community housing) or provide services to meet your needs or at all. We may also be

unable to apply any rent rebate and subsidy to your applicable rent charge. We may also not be able to comply with our registration requirements as a community housing provider.

#### **4.4 The purposes for which we collect, hold, use and disclose your personal information**

We collect, hold and use your personal information to:

1. identify and communicate with you
2. provide our services to you
3. assess your application for employment or eligibility to hold a board position with us and otherwise for our recruitment process
4. assess your eligibility for community housing (financial or otherwise)
5. assess and review rent for our properties or tenancies
6. assess your needs in relation to our properties and tenancies
7. provide related services, for example maintenance of our properties and tenancies
8. manage our properties and tenancies
9. find suitable property for tenancies
10. report to our board and to government including its agencies and departments
11. arrange translator services
12. provide training
13. conduct surveys including satisfaction surveys
14. provide newsletters and bulletins related to our services, properties and tenancies
15. manage and resolve any tenancy disputes
16. resolve any complaints
17. manage our business operations including complying with our legal and governance requirements
18. to send you information about us or our services including developments in housing communities, our properties, updates to our team members, and events and projects we are involved in. These communications may be through our newsletters or bulletins or through other communication types. At any time, you may opt out of these communications by contacting us through the contact details below or through the opt out mechanism in the communication
19. any other purpose disclosed at the time of collecting your personal information.

We will only use and disclose your personal information for the purposes as set out above or any directly related purpose or, where we have your consent, for another purpose, or as otherwise required or permitted by law.

We may disclose your personal information to:

1. employees and contractors
2. government (including its agencies and departments), to meet our reporting obligations
3. third party service providers and suppliers, including those providing maintenance and repair services to properties or tenancies, translators and recruiters, IT management providers and training providers, third parties conducting surveys on our behalf
4. your co-operative and/or other community housing providers
5. professional advisors
6. third parties authorised by you
7. other persons, including courts, tribunals, law enforcement agencies, as required or permitted by law

Where we no longer require your information, we take reasonable steps to destroy your information, where permitted by law.

#### **4.5 Accuracy, Access and Correction**

We take reasonable steps to ensure that the personal information we collect is accurate, complete and up to date. With your consent, we may access your CCeS account for this purpose or, if you are a job or board applicant, we may verify your personal information through recruiters and referees. However, we rely on you to advise us if there are any changes to your personal information.

We will, on request, provide you with access to your personal information which we hold. However, there may be some instances where we cannot grant access to the personal information we hold. For example, if a legal exception applies or where granting you access may interfere with the rights of others. In this event we will notify you of the reasons for any denial to access your personal information.

To request access to your personal information please contact our Privacy Officer whose detail can be found in the Contact section of this privacy policy.

#### **4.6 Security**

We hold your information primarily in electronic form and hard copy. We take reasonable technical and organisational measures to ensure that your personal information is protected from loss, misuse, interference and from unauthorised access, alteration or disclosure. This includes using well respected technical solutions, password protected devices, multifactor authentication, role-based permissions to access data and various processes to ensure data integrity. We also provide regular privacy awareness training for our staff.

However, transmission of data over the internet cannot be guaranteed to be totally secure. You should contact us as soon as possible if believe that the security of your personal information has been compromised by your interactions with us or our systems.

We may use cookies or other similar technology on our website that tracks your website usage and remembers your preferences. A cookie is a small piece of data stored on the user's device by the web browser while browsing a website.

Our website may link to third party websites. We do not have responsibility for the actions or policies of those sites. These should be checked by you before you use those websites.

#### **4.8 Contact /Complaints**

If you have questions, concerns or a complaint about this privacy policy or about our privacy practices please contact:

**Common Equity NSW Ltd**

**Privacy Officer**

**Email:** [feedback@commonequity.com.au](mailto:feedback@commonequity.com.au)

**Phone:** (02) 9356 9200

**Post:** PO Box Q1323, Sydney NSW 1230.

Our Privacy Officer will investigate the issue and determine the steps we will take to resolve the complaint. We will notify you of the outcome in writing (which includes email).

If you are not satisfied with our determination, you may contact the Office of the Australian Privacy Commissioner:

**Fax:** +61 2 61235145

**Post:** GPO 5288, Sydney NSW 2001

#### **5. References**

5.1 Privacy Act 1988 (Cth)

5.2 Health Records and Information Privacy Act (NSW)

5.3 Privacy and Personal Information Protection Act 1988 (NSW)

#### **6. Variations**

This policy may be reviewed and amended from time to time including on or before the review date set out below. Our latest privacy policy will be published on our website.

Designation of Approver	<b>Board approval</b>
Contact/Responsible Delegation	Head, Finance and Corporate Services
Date approved	<b>26 August 2025</b>
Review Date	August 2028
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