

1 PRELIMINARY



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PRIVACY POLICY

1.1.1 Approval

The contents of this Manual have been reviewed and approved by:

Alan Herbert
Director

THIS IS A "CONTROLLED" DOCUMENT

Document Controller: Operations Manager

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1 ABOUT THIS POLICY

1.1 PURPOSE

Complete Asset Management (CAM) is subject to the [Privacy Act 1988 \(Cth\)](#) (the Privacy Act). The Privacy Act contains 13 [Australian Privacy Principles](#) (APPs) which are rules about how CAM may collect, use, dispose, and store personal and sensitive information, including health information and how you may access and correct records containing your personal or sensitive information. CAM is committed to complying with all applicable privacy laws and protecting your privacy in accordance with the APPs.

The purpose of this Privacy Policy is to clearly communicate how CAM handles personal information. It gives you a better and more complete understanding of the type of personal information that CAM holds and the way CAM handles that information.

Basic information about CAM's personal information handling practices can be viewed in the summary version **Privacy Statement** on the CAM website. The **Privacy Statement** is a summary of how CAM collects, uses and discloses personal information and how to contact CAM if you would like to access or correct any personal information which CAM holds about you.

1.2 TO WHOM DOES THIS POLICY APPLY?

This Privacy Policy applies to CAM's collection, use and disclosure of personal information from any source, including contractors engaged by CAM, employees and other individuals engaged by, or providing services to CAM.

In relation to employees of CAM, this Privacy Policy will apply only to the extent that the collection, use or disclosure of that personal information does not fall within the definition of an exempt practice pursuant to section 7B(3) of the Privacy Act 1988 (Cth).

1.3 CURRENCY

This Privacy Policy has been updated as Version date 09-02-2023 and may change from time-to-time. The most up-to-date copy is held in the CAM's **Document Record Management System** and the summary version **Privacy Statement** is published on the CAM's website. The full Privacy Policy can be obtained by contacting CAM.

2 HOW CAM HANDLES YOUR PERSONAL INFORMATION

2.1 CAM'S LEGAL OBLIGATIONS

As stated in Section 1 of this Privacy Policy, as a not-for-profit health care service provider, funded by the Australian Government Department of Health, CAM is required to comply with the 13 [Australian Privacy Principles](#) (APPs) under the *Privacy Act 1988 (Cth)*, which regulates how CAM may collect, use, disclose, and store personal information and how individuals may access and correct personal information which CAM holds about them.

2.2 TERMS USED

In this Privacy Policy the following terms are used:

"Personal Information" as it is defined in the *Privacy Act 1988 (Cth)* means 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.

Personal information also includes 'sensitive information' which is information such as your race, religion, political opinions or sexual preferences, biometric information used for biometric verification or identification, biometric templates and health information. Information which is 'sensitive information' attracts a higher privacy standard under the *Privacy Act 1988 (Cth)* and is subject to additional mechanisms for your protection.

"Sensitive Information" includes information such as health records, criminal history checks, working with children checks, income and bank details, and grievances.

"Health Information" as defined in the *Privacy Act 1988 (Cth)* is a particular subset of 'personal information' and means information, or an opinion, about:

- the health (at any time) of an individual; or
- an individual's expressed wishes about the provision, to them, of services; or
- a health service provided or to be provided to an individual that is also personal information.

"CAM's Service Providers" are contracted health care service providers commissioned by CAM through funding from the Australian Government Department of Health.

2.3 OPEN AND TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION (AAP 1)

CAM displays a 'Summary **Privacy Statement**' on the CAM website, which is accessible to interested parties to inform them of CAM policies on management of personal information.

2.4 ANONYMITY AND PSEUDONYMITY (AAP 2)

You do not have to provide CAM with your personal information. You have the option of dealing with CAM anonymously, or by using a pseudonym, provided that this is lawful and practicable. CAM will not preclude an individual from participating in the activities of the organisation because they request anonymity; however, this may limit services that CAM, or its contracted service providers, can provide to you, if it is impracticable to deal with you in such an unidentified manner. An individual who chooses to access services of CAM anonymously will be advised of any potential consequences resulting from their decision.

2.5 FROM WHOM INFORMATION IS COLLECTED AND WHY (AAP 3)

2.5.1 Individuals/Customers/Visitors

CAM collects personal information from you that is reasonably necessary to engage with you for the provision of consultancy and Services by CAM, for CAM's functions or activities and for administrative and internal business purposes related to your dealings with CAM. If you provide incomplete or inaccurate information or withhold personal information, CAM may not be able to engage with you as required to meet that primary purpose.

In relation to individuals employed or engaged by CAM, and individuals providing services to CAM, this may include sensitive information including criminal record, or working with children checks, health information and credentials, qualifications and certifications.

CAM will usually collect your personal information directly from you. Sometimes it may need to collect information about you from a third party; however, will only do this where it is not reasonable or practical to collect this information directly from you. Sensitive information will not be collected without your consent unless authorised by law.

2.5.2 Types of Personal Information Collected and Held

If CAM receives your email address because you sent an email message, the email will only be used or disclosed for the purpose for which you have provided and will not be added to an emailing list or disclosed to anyone else unless you have consented for this purpose; eg; mailing list. CAM will record email addresses only after direct receipt of a message.

Where individuals subscribe to CAM publications, their details are added to the CAM contact database.

Personal information collected by email or electronic forms will be used only for the purpose for which it was provided and will not be disclosed without consent, except where authorised or required by law.

Health information may be collected by CAM directly to provide services, during the course of contract management.

CAM also collects data from Sailing Club Members.

Other information collected and held by CAM includes job applications, personnel files and referrer information, and COVID-19 vaccination status of staff, as required by CAM clients.

All data collected is considered personal information and will only be used for the purpose for which it was collected, or with prior consent from the client and will be managed in accordance with the Australian Privacy Principles (APPs).

2.5.3 How Personal Information is Obtained

CAM collects information which is:

- provided directly by you; and
- provided on your behalf, with your consent.

2.6 UNSOLICITED PERSONAL INFORMATION (APP 4)

Unsolicited personal information, which is personal information received by CAM where CAM has taken no active steps to collect the information, will be handled in accordance with Australian Privacy Principle (APP) 4.

2.7 NOTIFICATION OF COLLECTION OF PERSONAL INFORMATION (APP 5)

CAM will take all reasonable steps to ensure that suppliers and other interested parties have access to this Privacy Policy at, or before, the time of collection of personal information, or as soon as practicable afterwards. CAM Privacy Statement, which is a summary version of this Privacy Policy, is on the CAM website and is applicable to all personal information 'collected' about an individual, either directly from the individual or from a third party.

3 USE AND DISCLOSURE OF PERSONAL INFORMATION (AAP 6)

3.1 GENERAL

CAM only uses personal information for the primary purpose for which you have given the information to CAM, unless one of the following applies, such as where:

- you have consented for CAM to use your information for another purpose;
- the personal information you have given CAM you would reasonably expect, or CAM has told you, that your information is usually disclosed for another purpose, to other individuals, organisations or CAM contracted service providers;
- CAM is required or authorised by law to disclose your information for another purpose;
- the disclosure of your information by CAM will prevent or lessen, a serious and/or imminent threat to someone's life, health or safety, or to public health or public safety; or
- the disclosure of your information by CAM is reasonably necessary for the enforcement of a criminal law, or a law imposing a penalty or sanction, or for the protection of public revenue.

CAM may use or disclose your personal information as specified above via electronic processes, where available, or relevant.

Subject to law, the types of third parties CAM may disclose personal information to include:

- CAM's suppliers, contractors and external advisers;
- other organisations with whom CAM has alliances or arrangements;
- reporting Commonwealth and State government agencies and other funders;
- for the purpose of promoting respective consultancy and Services; and
- external payment systems operators.

Personal information will not be used for a secondary purpose unless the use or disclosure is required or authorised under law, a person has consented to the use or disclosure of their health information for the secondary purpose, for the use of research (de-identified data) or the use or disclosure is otherwise permitted by the Acts. If the identified information is to be used for a secondary or unrelated purpose, such as data analysis or research. Clients will be given the opportunity to refuse such use or disclosure. If a client is physically or legally incapable of providing consent, a responsible person (as described under the Act) may do so.

3.2 RELATIVES, GUARDIAN, CLOSE FRIENDS OR LEGAL REPRESENTATIVE

CAM may provide your personal information to your spouse or partner, parent, child, other relatives, close personal friends, guardians or a person exercising your power of attorney under an enduring power of attorney or who you have appointed your enduring guardian, unless you tell us that you do not wish us to disclose your personal information to any such person.

3.3 SUPPLIERS AND CONTRACTORS UNDER AGREEMENT

CAM may provide, or allow access to personal information, to contractors engaged to provide professional Services to CAM (eg, Information Communication Technology providers) or to contractors to whom aspects of CAM Services are outsourced.

Where CAM outsources any of its Services or commissions contractors to perform services on behalf of CAM, it takes reasonable steps in the circumstances to ensure that third parties (only organisations within Australia), have obligations under their contracts with CAM to comply with all laws relating to the Privacy Act 1988 (Cth) and other relevant privacy legislation (including security) and confidentiality of personal information, and where applicable CAM Privacy Policy.

3.4 OTHER COMMON USES OF PERSONAL INFORMATION

CAM may use or disclose personal information such as names, addresses, email addresses, phone numbers, position details and other identifying information directly or indirectly, where necessary, to/for:

- comply with legislative, regulatory and/or funding requirements;
- assessment for provision of regional health care service needs;
- liaise with health professionals or other third party health care providers;
- service providers engaged by CAM to provide services during the course of contract management;
- manage CAM service delivery processes relating to risk management, safety and security and quality management system certification and accreditation activities;
- conduct quality assurance, improvement, clinical audit and research activities in respect of the medical and allied health industry;
- engage service providers to provide Services to CAM or on behalf of CAM;
- collect data for statistical analysis, to provide broad advice to the government and industry and to monitor demand for Services;
- perform risk and probity checks in respect of contract management;
- oversee and undertake performance management of service providers;
- provide information about CAM consultancy and Services;
- perform administrative operations, including accounting, payroll, risk management, record keeping, archiving, systems development and testing;
- conduct marketing or client satisfaction research;
- develop, establish and administer alliances and other arrangements with other organisations in relation to the promotion and use of related consultancy and Services;
- develop and identify consultancy and Services that may interest clients and staff;
- tell clients about consultancy and Services that may be of interest to them;
- engage with client in their dealings with CAM and for other related purposes;
- maintain records as required under our policies and by law;
- in an emergency where life is at risk and the client is unable to provide consent;
- for other purposes required or permitted by law;
- perform activities such as quality management system processes, in accordance with government accreditation or compliance, audits, statistical analysis, risk and complaints management;
- invoice and account management, including storage of service provider details on CAM accounts software;
- comply with any applicable laws (eg, in response to a subpoena or compulsory reporting to State or Federal authorities, specified public health and safety circumstances); and
- anonymise and/or aggregate the personal information that we collect for the purpose of carrying out data analysis and reporting purposes.

CAM's suppliers are required to ensure that personal information will only be used for the purpose it was collected, or that would reasonably be expected by the client providing the information.

3.5 OTHER USES WITH YOUR CONSENT

With your consent CAM may also use your information for other purposes such as statistical analysis - to improve service offerings. However, unless you provide CAM with consent for this purpose to CAM contracted service providers who collect such information, CAM will not use your information in this way.

3.6 DISCLOSURE WITHOUT YOUR CONSENT

CAM and CAM's suppliers will only disclose your personal health information to a third party with your consent, unless:

- the disclosure is directly related to the primary purpose for collection;
- in an emergency situation, where release of information is necessary to aid medical treatment; or
- CAM is required by law to disclose the information (eg; reporting of communicable diseases).

3.7 JOB APPLICATIONS

CAM collects personal information of job applicants who have responded to an advertised position for the primary purpose of assessing and (if successful) engaging applicants. The purpose for which CAM uses personal information of job applicants includes:

- employment, or engagement, suitability checks;
- managing employment, engagement and placement; and
- ensuring that CAMs holds relevant contact information.

CAM may also store information provided by job applicants who were unsuccessful for the purposes of future recruitment or employment opportunity.

3.8 DIRECT MARKETING (APP 7)

CAM will only use or disclose personal information for direct marketing purposes where the individual has either consented to their personal information being used for direct marketing or has a reasonable expectation that their personal information will be used for this purpose, and conditions relating to opt-out mechanisms are met.

If CAM wishes to use or disclose personal information for the purpose of direct marketing, it will always disclose this to the person/s concerned and will seek their written approval before using personal information for marketing purposes.

3.9 CROSS BORDER OR OVERSEAS DISCLOSURE OF PERSONAL INFORMATION (APP 8)

CAM may enter into arrangements with third parties to store data it collects or to access the data to provide Services (such as data processing) and such data may include personal information, which may be shared for statistical purposes with State and Federal grant funding authorities. CAM will take reasonable steps to ensure that the third parties do not breach the APPs. The steps CAM will take may include ensuring the third party is bound by privacy protection obligations which are the same (or substantially the same) as those which bind CAM, with a requirement that the third party has information security measures in place which are of an acceptable standard and approved by CAM.

CAM will take steps to protect an individual's privacy if information is to be sent interstate or outside Australia and will only transfer your personal information overseas when:

- you have given written consent to the transfer; or
- the transfer is necessary for the fulfilment of a contract between you and CAM; or
- the transfer is for your benefit, but it is impractical to obtain consent; or
- the recipient is bound by legislation that is substantially similar to the Privacy Act 1988 (Cwth); or
- it is believed that the information will be protected by a privacy scheme or legal provisions comparable to those in Australia; or

- CAM is reasonably sure that the information will not be held, used or disclosed inconsistently with the privacy principles set out in the Privacy Act 1988 (Cwth).

4 DATA RECORDING, QUALITY AND SECURITY

4.1 ADOPTION, USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS (APP 9)

As required by Australian Privacy Principles (APP 9), CAM will not use Medicare or Veterans Affairs numbers or other identifiers assigned by a Commonwealth or State Government agency to identify personal information.

4.2 DATA QUALITY (APP 10)

CAM will take reasonable steps to ensure that personal information which it may collect, use or disclose is accurate, complete and up-to-date.

4.3 DATA SECURITY FOR INFORMATION WE HOLD (APP 11)

CAM may store the personal information it collects from you in various forms. CAM will comply with the APPs, and this Privacy Policy, in respect of personal information in whatever form that information is stored.

Storage of personal information may be in physical (paper) form and may also include an electronic record system. Some of your health information may be stored offsite with a third party provider or CAM contracted health care provider.

CAM will take all reasonable steps to:

- ensure that personal information collected and held is accurate, complete and up-to-date;
- ensure that its web environment, internal network and databases are protected from unauthorised access using current technologies, to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure.
- protect the personal information from misuse, loss or unauthorised access or disclosure;
- store personal information securely with access limited to only those people necessary to manage and use the information in accordance with the full CAM Privacy Policy;
- use technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect your privacy.

CAM will store personal and health information on secure servers that are protected in controlled facilities.

CAM will destroy or permanently de-identify any information which is in its possession or control and which is no longer needed for the purpose for which it was collected, provided CAM is not required under an Australian law or court/tribunal or otherwise to retain the information.

4.4 ACCESS TO AND AMENDMENT OR CORRECTION OF PERSONAL INFORMATION (APP 12 AND 13)

You may request access to personal information held by CAM. You can also request an amendment to personal information held should you believe that it contains inaccurate information. Individuals may request access to their personal or health information held by CAM by writing via the options in Section 5.

CAM will allow access or make the requested changes, unless there is a reason under the Privacy Act 1988 (Cth), or other relevant law to refuse such access or refuse to make the requested changes. There are some circumstances in which access is restricted, and in these cases reasons for denying access will be explained.

If CAM does not agree to change your personal information in accordance with your request, it will accept a written statement of the requested changes which will be held with your personal information. For security reasons and to protect individuals' privacy, applicants will be asked to provide proof of their identity. There is no charge associated

with making a request and CAM will seek to process the request and provide access to the information, in most cases, within 30 days.

Should you wish to obtain access to, or request changes to, your personal information held by CAM you can contact the CAM Head Office via the options below.

5 HOW TO CONTACT CAM ABOUT PRIVACY ISSUES

5.1 PRIVACY INFORMATION CONTACT OPTIONS

By letter:	PO Box 425 Dubbo NSW 2830
By email:	admin@camsdubbo.com.au
By telephone:	02 6884 0440
Attention:	Operations Manager

5.2 MAKING A PRIVACY COMPLAINT

You may submit a complaint about the way CAM has handled personal information. Complaints should be in writing utilising the complaints process on the CAM website.

The complaint should provide sufficient detail, so the issues and concerns can be investigated. Unless a complaint can be dealt with immediately to the satisfaction of both parties, CAM will provide a written response to the complaint within 30 days on the complaint being received.

If you are not satisfied with the outcome of an investigation, a complaint can be submitted to the Office of the Australian Information Commissioner (OAIC). Further details about making a privacy complaint to:

- the OAIC can be found at www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us/
- contact the Office of the Federal Privacy Commissioner, Privacy Hotline 1300 363 992 (local call charge)
- via www.privacy.gov.au