

Privacy Policy

Policy number	17	Version	2.0
Drafted by	Kerry Bull	Approved by Board on	3 rd Nov 2025
Responsible person	Chair	Scheduled review date	Nov 2025

Introduction

The Board of PRECI is committed to protecting the privacy of personal information which the organisation collects, holds, and administers. Personal information is information that directly or indirectly identifies a person.

Purpose

The purpose of this document is to provide a framework for PRECI in dealing with privacy considerations.

Policy

PRECI collects and administers a range of personal information and is committed to protecting the privacy of personal information it collects, holds, and administers.

PRECI recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the Privacy Act 1988 (Cth).

PRECI is bound by laws that impose specific obligations regarding the handling of information. The organisation has adopted the following principles, contained as minimum standards, for handling personal information.

PRECI will

- Only collect information that the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

Privacy Procedures

Procedures number	17	Version	V2.0
Drafted by	Kerry Bull	Approved on	3rd Nov 2025
Responsible person	Chair	Scheduled review date	Nov 2027

1. Responsibilities

PRECI's Board is responsible for developing, adopting and reviewing this policy.

PRECI's Board Chair is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

2. Processes

2.1 Collection

PRECI will:

- Only collect information necessary for PRECI's performance and primary function.
- Collect personal information only by lawful and fair means and not in an unreasonably intrusive way.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information directly from the person whenever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect sensitive information only with the person's consent or if required by law. (Sensitive information includes health information and information about religious beliefs, race, gender, and others).
- PRECI will also collect sensitive information about an individual if such collection is necessary to prevent or lessen a serious and imminent threat to the life or health of any individual, where the individual whom the information concerns:
 - is physically or legally incapable of giving consent to the collection; or
 - physically cannot communicate consent to the collection
- If PRECI collects information during the course of the activities of a non-profit organisation—the following conditions must be satisfied:
 - the information relates solely to the members of the organisation or to individuals who have regular contact with it in connection with its activities;

- at or before the time of collecting the information, PRECI inform the individual whom the information concerns that it will not disclose the information without the individual's consent; and
- the collection must be necessary for the establishment, exercise or defence of a legal or equitable claim.
- PRECI will collect health information about an individual if:
 - the information is necessary to provide a health service to the individual; and
 - the information is collected as required or authorised by or under law and in accordance with rules established by competent health or medical bodies that deal with obligations of professional confidentiality which bind the organisation.
- Determine, where unsolicited information is received, whether the personal information could have been collected in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

2.2 Use and Disclosure

PRECI will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, PRECI will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
 - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
 - the person has consented; or
 - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health, or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and PRECI has provided an opt out and the opt out has not been taken up.
- In relation to personal information collected from sources other than the person themselves, use it for direct marketing only if the person whose personal information has been collected has consented (and has not taken up the opt-out).
- In each direct marketing communication with the individual, PRECI draws to the individual's attention, or prominently displays a notice, that he or she may express a wish not to receive any further direct marketing communications.
- State in PRECI privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as PRECI is required to be. Such disclosures will only be made if:
 - the overseas recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the National Privacy Principles; or
 - the individual consents to the transfer; or

- the transfer is necessary for the performance of a contract between the individual and the organisation, or for the implementation of pre-contractual measures taken in response to the individual's request; or
 - the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between the organisation and a third party; or
 - the organisation has taken reasonable steps to ensure that the information which it has transferred will not be held, used or disclosed by the recipient of the information inconsistently with the National Privacy Principles.
- In relation to the overseas transfer of personal information, if it is impractical for PRECI to receive the person's consent to that transfer, PRECI must have sufficient reasons to believe that the person would likely give consent could they be contacted.
- Provide all individuals access to personal information except where it is a threat to life or health or it is authorised by law to refuse and, if a person is able to establish that the personal information is not accurate, then PRECI must take steps to correct it. PRECI may allow a person to attach a statement to their information if PRECI disagrees it is inaccurate.
- Where, for a legal or other reason, we are not required to provide a person with access to the information, we consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.
- Each written direct marketing communication with the individual must set out PRECI's business address and telephone number and, if the communication with the individual is made by other electronic means, a number or address at which the organisation can be directly contacted electronically.
- If the disclosure of sensitive information is necessary for research, or the compilation or analysis of statistics, relevant to public health or public safety and it is impracticable for PRECI to seek the individual's consent before the use or disclosure and the use or disclosure is conducted in accordance with guidelines approved by the Commissioner under section 95A, the organisation may make such a disclosure.
- If PRECI has sufficient reasons to believe that an unlawful activity has been, is being or may be engaged in, and the disclosure of personal information becomes a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities, the organisation may make such disclosures.
- PRECI may further disclose personal information if its disclosure is mandated by an enforcement body or is required for the following:
 - the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law;
 - the enforcement of laws relating to the confiscation of the proceeds of crime;
 - the protection of the public revenue;
 - the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct;
 - the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of the orders of a court or tribunal.

For the purpose of this Clause, PRECI must make a written note of the use or disclosure.

2.3 Storage

PRECI will:

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or disclosure.
- Before PRECI discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. PRECI will have systems which provide sufficient security.
- Ensure that PRECI data is up-to-date, accurate and complete.

2.4 Destruction and de-identification

PRECI will:

- Destroy personal information once is no longer required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information PRECI holds and will not use any government-related identifiers unless they are reasonably necessary for our functions.

2.5 Data Quality

PRECI will:

- Take reasonable steps to ensure the information PRECI collects is accurate, complete, up-to-date, and relevant to the functions we perform.

2.6 Data Security and Retention

PRECI will:

- Only destroy records in accordance with the organisation's Records Management Policy.

2.7 Openness

PRECI will:

- Ensure stakeholders are aware of PRECI's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.
- On request by a person, PRECI must take reasonable steps to let the person know, generally, what sort of personal information it holds, for what purposes, and how it collects, holds, uses and discloses that information.

2.8 Access and Correction

PRECI will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up-to-date.

- If the individual and PRECI disagree about whether the information is accurate, complete and up-to-date, and the individual asks PRECI to associate with the information a statement claiming that the information is not accurate, complete or up-to-date, then PRECI will take reasonable steps to do so.
- PRECI will provide to the individual its reasons for denial of access or a refusal to correct personal information.
- PRECI can withhold the access of an individual to his/her information if:
 - providing access would pose a serious and imminent threat to the life or health of any individual; or
 - providing access would have an unreasonable impact upon the privacy of other individuals; or
 - the request for access is frivolous or vexatious; or
 - the information relates to existing or anticipated legal proceedings between the organisation and the individual, and the information would not be accessible by the process of discovery in those proceedings; or
 - providing access would reveal the intentions of the organisation in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
 - providing access would be unlawful; or
 - providing access would be likely to prejudice an investigation of possible unlawful activity; or
 - an enforcement body performing a lawful security function asks PRECI not to provide access to the information on the basis that providing access would be likely to cause damage to the security of Australia.
- Where providing access would reveal evaluative information generated within the organisation in connection with a commercially sensitive decision making process, PRECI may give the individual an explanation for the commercially sensitive decision rather than direct access to the information.
- If PRECI decides not to provide the individual with access to the information on the basis of the above mentioned reasons, PRECI will consider whether the use of mutually agreed intermediaries would allow sufficient access to meet the needs of both parties.
- PRECI may charge for providing access to personal information. However, the charges will be nominal and will not apply to lodging a request for access.

2.9 Identifiers

- PRECI will not adopt as its own identifier of an individual an identifier that has been assigned by any third party. It may however adopt a prescribed identifier by a prescribed organisation in prescribed circumstances.
- PRECI will not use or disclose the identifier assigned to an individual by a third party unless:
 - the use or disclosure is necessary for the organisation to fulfil its obligations to the agency; or
 - the use or disclosure is by a prescribed organisation of a prescribed identifier in prescribed circumstances.

2.10 Anonymity

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

2.11 Making information available to other organisations

PRECI can release information to third parties where it is requested by the person concerned.

Related Documents

- Confidentiality Policy
- Records Management Policy
- Privacy Act 1988 (Cth)

Privacy Policy – For external use

Your privacy is important

This statement outlines PRECI's policy on how PRECI uses and manages personal information provided to or collected by it.

PRECI is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

PRECI may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to PRECI's operations and practices and to make sure it remains appropriate to the changing legal environment.

This privacy policy assumes that you are resident in Australia. If you are resident in the UK or Europe, please contact us for more information regarding how we treat your personal information.

What kind of personal information does PRECI collect and how does PRECI collect it?

The type of information PRECI collects and holds includes (but is not limited to) personal information, including sensitive information.

Personal Information you provide:

PRECI will generally collect personal information held about an individual by way of phone calls, forms, meetings etc. You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

Personal Information provided by other people:

In some circumstances PRECI may be provided with personal information about an individual from a third party.

In relation to employee records:

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to PRECI's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between PRECI and the employee. However, PRECI must provide access and ensure compliance with the Health Privacy Principles under the Victorian Health Records Act 2001.

How will PRECI use the personal information you provide?

PRECI will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, PRECI will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere we will still send you direct marketing information where you have consented and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

Job applicants, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, PRECI's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which PRECI uses personal information of job applicants, staff members and contractors include:

- for insurance purposes;
- to satisfy PRECI's legal obligations,

Where PRECI receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

Volunteers:

PRECI also obtains personal information about volunteers who assist PRECI in its functions or conduct associated activities, such as to enable PRECI and the volunteers to work together.

Who might PRECI disclose personal information to?

PRECI may disclose personal information, including sensitive information, held about an individual to:

- government departments;
- people providing services to PRECI
- anyone you authorise PRECI to disclose information to.

Sending information overseas:

PRECI will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

We do/do not use overseas providers of IT services including servers and cloud services.

How does PRECI treat sensitive information?

In referring to 'sensitive information', PRECI means:

"information relating to a person's racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual orientation or criminal record, that is also personal information; and health information about an individual".

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

PRECI's staff are required to respect the confidentiality of personal information and the privacy of individuals.

PRECI has in place steps to protect the personal information PRECI holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

Updating personal information

PRECI endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by PRECI by contacting the chair of PRECI at any time.

The Australian Privacy Principles and the Health Privacy Principles require PRECI not to store personal information longer than necessary. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what personal information PRECI holds about you.

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which PRECI holds about them and to advise PRECI of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information PRECI holds about you, please contact the Privacy Officer in writing.

PRECI may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, PRECI may charge a fee to retrieve and copy any material. If the information sought is extensive, PRECI will provide an estimate of the likely cost in advance.

How long will PRECI keep my information?

Your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

Enquiries and privacy complaints

If you would like further information about the way PRECI manages the personal information it holds, please contact the Chair. If you have any concerns, complaints or you think there has been a breach of privacy, then please contact the Chair who will discuss with you, usually over the phone. If we then have not dealt satisfactorily with your concerns, we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting then you can refer your complaint to the Office of the Australian Information Commissioner via:

email: enquiries@oaic.gov.au

phone: 1300 363 992