

Privacy Policy

RAAF Veterans' Residences Trust

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Context and application

1. The RAAF Veterans' Residences Trust (we, our, us, the Trust) recognises the importance of protecting your privacy and personal information. As a Corporate Commonwealth Entity, the Trust is bound by the Australian Privacy Principles in the Privacy Act 1988 (Cth) (the Privacy Act), which regulates how agencies collect, use, disclose and store personal information, including sensitive information, and how individuals may access and correct records containing their personal information. We respect your rights to privacy under the Privacy Act and we comply with all the Privacy Act's requirements in respect of the collection and management of your personal information.

2. This document is our privacy policy and it tells you how we collect, use, store and disclose your personal information and the way in which you can access and correct your personal information.

General information

What personal information we collect

3. The Trust collects personal information that is reasonably necessary for, or directly related to, its functions and activities. The Trust will only use and disclose your personal information for the purposes it was collected, or otherwise in accordance with the Privacy Act.

4. When used in this privacy policy, the term 'personal information' has the meaning given to it in the Privacy Act. In general terms, it is any information that can be used to identify you whether or not the information is true. If the information we collect identifies you, or your identity can be reasonably ascertained from it, the information will be considered personal information.

5. The type of personal information we may collect includes, but is not limited to:

- a. name;
- b. mailing and/or street address;
- c. email address;
- d. telephone contact number;
- e. facsimile number;
- f. age and/or birth date;
- g. profession, occupation and/or job title;
- h. photographic images and/or pictorial representations;
- i. any additional information relating to you that you provide to us directly or indirectly
- j. information you provide to us through our customer surveys or visits by our representatives from time to time.

6. We understand that from time to time you may not want to provide this information to us. That's fine, however, it may mean that we are not able to provide you with the products and services you require, or a high level of service. In circumstances where it will be impracticable for the Trust to deal with you anonymously, or through the use of a pseudonym, the Trust will ordinarily request you to identify yourself to enable the Trust to appropriately action your request and carry out its functions and activities.

How we collect your personal information

7. We will generally collect your personal information directly from you. The ways in which we collect personal information may include, but is not limited to:
 - a. during conversations with you via telephone and in person;
 - b. through written correspondence with you, including email; and
 - c. when you complete an application.
8. From time to time, we may collect personal information from third parties including, but not limited to:
 - a. persons who are authorised to act on your behalf;
 - b. other government agencies;
 - c. law enforcement agencies;
 - d. credit reporting agencies;
 - e. service providers to the Trust.
9. Collection of personal information from a third party may occur if:
 - a. you consent;
 - b. collection from the third party is required or authorised under an Australian law, or a court/tribunal order; or
 - c. direct collection is unreasonable or impracticable.
10. In limited circumstances the Trust may receive personal information about third parties from individuals who contact us or supply us with personal information belonging to others in the documents they provide. This is referred to as 'unsolicited personal information'. In these circumstances we will consider whether the Trust could have collected the information had it solicited the information, and will handle it in accordance with the Privacy Act.

Why we collect, hold, use and disclose your personal information

11. We collect personal information about you so that we can perform our functions and activities and to provide the best possible quality of customer service. We collect, hold, use and disclose your personal information to:
 - a. identify you;

- b. provide products and services to you and to send communications requested by you;
- c. answer enquiries, and provide information or advice about existing and new products or services;
- d. conduct business processing functions;
- e. update our records and keep your contact details up-to-date;
- f. process and respond to any complaint made by you;
- g. conduct planning, product or service development; program evaluation; quality control and research for the purposes of the Trust, its contractors or service providers;
- h. provide information to our contractors or service providers to enable them to provide our products and services to you, including business, marketing, research and related purposes; and
- i. comply with any Australian law; orders of courts or tribunals; any rule, regulation, lawful and binding determination, decision or direction of a regulator; or in co-operation with any governmental authority of any country (or political sub-division of a country).

To whom we may disclose your information

12. The third parties we may disclose your personal information to include, but are not limited to:

- a. our employees, contractors or service providers for the purposes of Trust operation; and
- b. any organisation for any authorised purpose with your express consent.

13. Your personal information will not be shared or disclosed other than as described in this privacy policy unless:

- a. you consent;
- b. the disclosure is authorised or required by or under an Australian law or court/tribunal order; or
- c. is otherwise permitted under the Privacy Act.

14. Once the Trust receives information from you, the information is maintained in a secure environment. Your personal information will not be released unless the law permits it or your permission is granted.

15. We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed in accordance with the requirements of the Archives Act 1983 (Cth).

Employees and contractors

16. We collect and handle information for the purposes of recruiting and engaging staff and contractors, and to properly manage the employment of staff and our business affairs.

17. The types of information we collect and hold include:

- a. employee, contractor personal and contract details;
- b. referee and emergency contact details;
- c. job applications;
- d. employment contracts, and other records relating to employment and contractor engagement;
- e. salary and leave records;
- f. superannuation, taxation and banking details
- g. medical certificates and health related information; and
- h. information relating to training, conduct and performance.

18. We may collect and use your health and other personal information to ensure the health and safety of your work colleagues, including managing potential, suspected or confirmed cases of COVID-19 or similar medical conditions. We may also collect and use personal information about your family members, or others with whom you live for this purpose.

19. Your health and other personal information may be disclosed on a need-to-know basis. We may also need, or be legally required, to disclose your health and other personal information to other government entities, or third parties, including health authorities, for health and safety purposes.

Cloud Computing

20. The Trust complies with its cloud computing obligations in accordance with the guidelines issued by the Attorney-General. For further information, please refer to the Australian Government Information Security Management Guidelines.

Accessing and correcting personal information, or reporting a breach

How you can access and correct your personal information

21. You may request access to any personal information we hold about you at any time by contacting us on the details below. Where we hold information that you are entitled to access, we will provide you with suitable means of accessing it (e.g. by mailing or emailing it to you). If you require access in a particular form, please indicate this in your request. Please note that under the Privacy Act, access may be refused in certain circumstances where the Trust is required or authorised to do so under the Freedom of Information Act 1982 (Cth), or another Commonwealth Act that provides for access to documents or information.

22. If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request to have it amended. We will consider whether the information requires amendment, and will take reasonable steps to correct or update your information where appropriate.

23. We will not charge you for giving access or making corrections to your personal information. We may need to ask you to verify your identity before we provide access to your information or correct it.

24. In circumstances where it is not appropriate to grant you access or amend your personal information, we will give you written notice of the reasons for our decision within 30 days of receipt of your request, together with information about mechanisms available to seek review if you do not agree with the decision.

How to contact us about a possible breach of privacy

25. If you believe that we have breached your privacy, please contact us using the contact information below and provide details of the incident so that we can investigate it.

26. When a complaint is received, the Trust will conduct internal enquiries into the possible breach. The Trust will deal with your complaint as quickly as possible and will keep you informed of its progress. Once the Trust has completed its internal enquiries, you will be advised of the outcome in writing.

27. If you are not happy with the response provided by the Trust, you can make a complaint to the Office of the Australian Information Commissioner (OAIC). Information on how to make a complaint can be found on the OAIC website (www.oaic.gov.au)

28. If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact the Trust via the details set out below.

29. Requests and complaints will be treated confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner. Please contact the Trust at:

Post: RAAF Veterans Residences Trust, RAAF Base Williams, Laverton VIC 3028.

Email: raaf.vrt@defence.gov.au

[Changes to our privacy policy](#)

30. We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

31. This privacy policy was last updated on 26 Aug 21.