

Purpose

This policy sets out the way **echo** handles personal information including collection, storage, access alterations and destruction of records.

Scope

This policy applies to all employees and **echo** as a whole.

Definition

Personal information means:

- Records or information held by **echo** to **provide** a service or employment; and
- Records or information held by **echo** for the purpose of **conducting** those services.

Obligations

This policy sets out how we comply with our obligations under the Privacy Act 1988 and the Australian Privacy Principles which are set out in a Schedule to that Act. The Australian Privacy Principles (APPs) regulate how **echo**, as an entity, must collect, use, disclose and store personal information. The APP's also give individuals the right to access and correct their information in certain circumstances.

Why do we collect information about you?

We collect information in order to meet **echo** business obligations. We also collect information for purposes, such as processing Freedom of Information (FOI) requests, conducting data matching, providing services in a culturally appropriate way and conducting statistical analysis to improve **echo** service delivery.

Collection

1. Personal information will be collected by **echo** for inclusion in a record (or in a generally available publication) where:
 - the information is collected for a purpose that is lawful and directly related to a function or activity of **echo**; and
 - the collection of the information is necessary for or directly related to that purpose.
2. **echo** will only collect personal information by fair and lawful means and not in an unreasonable intrusive manner.

When Collecting Information:

Within reason **echo** shall take such steps to ensure that:

- the information collected is relevant to that purpose and is up to date and complete; and
- the collection of the information does not intrude to an unreasonable extent upon the personal affairs of the individual concerned.

Before information is collected, or if that is not practicable, as soon after the information is collected, **echo** will make the individual concerned aware of:

- The purpose for which the information is being collected;
- If the collection of the information is authorised or required by or under law;
- the fact that the collection of the information is so authorised or required;
- any person to whom, or anybody or agency to which, it is **echo's** usual practice to disclose personal information of the kind so collected, and (if known by **echo**); and
- any person to whom, or anybody or agency to which, it is the usual practice of that first-mentioned person, body or agency to pass that information.

Use of Personal Information

Your personal information will not be used for purposes unrelated to the purpose for which it was originally collected unless the other use is authorised or required by or under law, or one of the other exceptions in the Australian Privacy Principles apply.

echo will ensure, to the best of **echo's** ability that the information you provide to us remains private and is only used for the purposes you agreed to.

echo will not disclose your personal information to anyone, including to other Government agencies organisations or third parties unless:

- You have consented;
- The disclosure is required or authorised by or under law;
- The disclosure is otherwise permitted by the Australian Privacy Principles.

When, why and to whom your personal information may be disclosed depends on the services to which the information related and the registration under which we are delivering those services to you.

Disclosure of Personal Information

echo will not reveal, disclose, sell, distribute, rent, license, share or pass your personal information on to a third party, other than those that **echo** have a binding agreement with, ensuring that the third party affords your personal information the similar levels of protection as **echo**.

Furthermore, we may use and disclose your Personal Information for another purpose if:

- You would reasonably expect us to disclose it for that purpose;
- That purpose is related to the purpose specified by you at the time of the collection;
- **echo** may disclose personal Information to unrelated third parties to enable outsourcing of functions where that disclosure or use is for a related secondary purpose and has been notified to individuals or where such disclosure is within the individual's reasonable expectations;
- **echo** will take reasonable steps to ensure that its third parties include requirements for third parties to comply with the use and disclosure requirements of the Privacy Act;
- **echo** reasonably believes that the use is necessary to lessen or prevent a serious or imminent threat to an individual's life or health; covered under the 'Releasing Protected Information' under the Social Security Administration Act, Class Public Interest Certificate (No.1) 2017 (see <https://www.legislation.gov.au> for further information);
- **echo** has reason to suspect that unlawful activity has been, or is being engaged in, and uses the information as part of its investigation, or in reporting its concerns to the relevant authority;
- The use and disclosure is specifically authorised by law; or
- The use and disclosure is reasonably necessary for the enforcement of the criminal law, a law imposing a pecuniary penalty, or for the protection of public revenue.

echo does not use or disclose your Personal Information for the purpose of direct marketing unrelated products or services. **echo** will not use personal information without taking reasonable steps to ensure that the information is accurate, complete and up to date.

The Australian Privacy Principles impose additional obligations on **echo** when collecting, using or disclosing sensitive information.

echo will not collect personal information revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, or sexual activity or orientation unless:

- Your consent has been obtained; or
- The collection is required or specifically authorised by law or a court/tribunal order;
- The collection is necessary to prevent or lessen a serious and imminent threat to the life or health of any individual, where the subject of the information is physically or legally incapable of giving consent; or

- The collection is necessary for the establishment, exercise or defence of a legal claim.

Storage and Security

When **echo** are in the possession or control of a record that contains personal information **echo** shall ensure:

- That the record is protected, by such security safeguards as is reasonable in the circumstances to prevent against loss, against unauthorised access, use modification or disclosure, and against other misuse; and
- That if it is necessary for the record to be given to a person in connection with the provision of a service to **echo**, everything reasonable within the power of **echo** is done to prevent unauthorised use or disclosure of information contained in the record.

Transferring Personal Information Overseas

echo does not send information overseas.

Anonymous Transactions

echo will allow you to transact anonymously wherever that is reasonable and practicable to so.

Access and Correction

You will be provided with the opportunity to access the personal information we hold on you and, where appropriate, you may be able to correct that information if you determine that it is incorrect. **echo** will allow any person on whom records are maintained to have access to those records unless legislation (e.g. the Freedom of Information Act) or Government contracts requires or authorises the refusal of access. To obtain access to your personal information please make a request at your closest office. Before giving access to information, **echo** will require that you provide proof of identification and this along with your details of the request will be recorded on your file.

Queries?

echo will take reasonable steps to ensure that your personal information is accurate, completed and up-to-date. To assist us in this regard and your first point of contact for inquiries about privacy, please contact us on 9210 2100 or by email: echo@echoaustralia.com

Any formal privacy related complaint should be directed in writing to the **echo** Operations Manager, 7/45-51 Ringwood Street, Ringwood Vic 3134.

echo will endeavour to manage any privacy related complaint quickly and efficiently.