

# PUBLIC PRIVACY POLICY

Help Enterprises Limited

## INTRODUCTION

This Public Privacy Policy (**Policy**) is Help Enterprises Limited's ACN 009 776 032, ABN 46 479 304 129 ("Help Enterprises") official privacy policy as required by the *Privacy Act 1988* (Cth) (the "Act") and the Australian Privacy Principles (the "APPs") contained in the Act.

This Policy applies to all personal information (including sensitive information) about individuals, which Help Enterprises and its various business divisions collect, hold, use and disclose.

This Policy explains how Help Enterprises manages personal information. This includes:

- the kinds of personal information (including sensitive information) about individuals that we collect;
- how and why we collect that personal information;
- how we use it;
- how we store and hold it;
- the purposes for which we will disclose it; and
- the rights of individuals in relation to their personal information held by us, including the rights of individuals to access and seek correction of their personal information held by us and to complain about a breach of the APPs.

Help Enterprises is committed to complying with Commonwealth legislation (the Act and the APPs) that deals with how we may collect, hold and use personal information (including sensitive information) about individuals and to protecting and safeguarding individual's privacy when they deal with us.

## YOU AND YOUR INFORMATION

Help Enterprises will only collect and use personal information that is reasonably necessary for one or more of our functions or activities, or as required by law.

Help Enterprises is a registered charity whose purposes are to provide relief and assistance to people with disability and to advance social or public welfare (**Purposes**). Accordingly, all of our activities are undertaken to fulfil these Purposes.

These activities include:

- Providing disability support and care services, including health and wellbeing services, services that are or may be funded by the National Disability Insurance Scheme (NDIS), social and community support, skills and training, youth employment services, supported employment, homing and accommodation, equine assisted therapy, allied health, life planning and family support services;
- Providing horse riding classes and training;
- Employment and training services, including operating a Registered Training Organisation;
- Supply chain services, including warehousing, third-party logistics, assembly, packaging, light manufacturing and recycling;
- Manufacturing services relevant to the building and construction industry;
- Operating a wholesale nursery business; and
- Operating a café and catering service.

## WHAT KINDS OF INFORMATION DO WE COLLECT?

We collect, hold, use and disclose **personal information**. **Personal information** is defined in section 6 of the Act to mean *“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.”*

The personal information which we collect and use about you will depend on your relationship with us and the services we provide to you.

In order to provide our services, Help Enterprises also sometimes needs to collect **sensitive information** about some individuals.

**Sensitive information** is a subset of personal information and is defined to mean information or an opinion (which is also personal information) about an individual's: racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association membership of a trade union; sexual preferences or practices; criminal record; or health information, which includes such things as information or an opinion about the health (including an illness, disability or injury) or an individual.

To fulfil our Purposes, the kinds of personal information that Help Enterprises may collect, hold and use in respect of individuals includes:

- Names, including the name/s of carers, parents, legal guardians and next-of-kin;
- Contact details (including those of carers, parents, legal guardians and next-of-kin) and identification information including photo identification;
- Age;
- Gender;
- Ethnicity;
- Nationality;
- Academic history;
- Employment history;
- Health information including: details of any mental conditions or disabilities; prescribed medications; medical conditions; prescribed therapies; assistance required; medical procedures; etc.
- Medicare information;
- Financial information, including information about transactions and trading history with Help Enterprises;
- Information about credit history;
- Criminal history.

## HOW PERSONAL INFORMATION IS COLLECTED

Help Enterprises will only collect personal information about individuals directly from the individual unless it is unreasonable or impracticable to do so.

For example, sometimes we may need to collect personal information about individuals from third parties where we need information from a third party to assist us to process an application (such as to verify information an individual has provided or to assess the individual's circumstances) or to assist us to locate or communicate with the individual.

Where the information Help Enterprises needs to collect is sensitive information, Help Enterprises will only collect it with the express consent of the individual or their Legal Guardian.

Some examples of how we collect personal information from individuals include:

- Where an individual completes an Enrolment Form, Post School Services Program Initial Interview Form, Course Referral Form, Application for Registration – Job Seeker Identification Number, or any other application form required to be completed by an individual to enable and/or facilitate services to be provided by us;
- When an individual applies for a job with us;
- Where an individual provides health information to us to enable and/or facilitate services to be provided by us;
- Where an individual contacts Help Enterprises, we may keep a record of that communication or correspondence;
- When you contact us online via our web enquiry form on our website, or on one of our social media platforms;
- When applying for and/or establishing and/or accessing an account with us or ordering products or services from us;
- Conducting certain types of transactions such as cheque or credit card purchases, donations or refunds;
- An individual submitting their contact details to be included on our mailing lists;
- When an individual places an order on our web-site to purchase goods or make a donation, we may require the individual to provide us with contact information including their name, address, telephone number or email address and financial information (such as credit card details);
- Purchasing your contact details from a third party service.

## HOW PERSONAL INFORMATION IS USED AND DISCLOSED

Help Enterprises will only use or disclose personal information about an individual for the purposes for which it was collected **unless**:

- you have consented to the use or disclosure;
- you would reasonably expect us to use or disclose the information for the other purpose which is directly related to the original purpose; or
- the use or disclose is required or authorised by law and/or under the Act.

Some examples of how we use or disclose personal information include:

- Processing an application or enrolment form or service request (including verifying a person's identity, health information, employment history, carer's assistance required, employment history, Government assistance eligibility);
- Reporting to government agencies and funding bodies regarding the outcomes of our programmes and services;
- Communicating with our service providers to provide our services or conduct our activities (for example, insurance providers);
- Processing an application or product order or service request;
- Sending you communications regarding our latest activities e.g. direct marketing;
- Marketing and/or feedback;
- Managing and providing our products and services or other relationships and arrangements, including processing receipts, payments and invoices;
- Assessing and monitoring credit worthiness;
- Detecting and preventing fraud and other risks to us and our customers;

- Responding to inquiries about applications, accounts or other products, services or arrangements;
- Understanding our clients' and customers' needs and developing and offering products and services to meet those needs;
- Researching and developing our products and services and maintaining and developing our systems and infrastructure (including undertaking testing);
- Dealing with complaints;
- Meeting legal and regulatory requirements;
  - Various Australian laws may expressly require us to collect/and or disclose personal information about individuals, or we may need to do so in order to be able to comply with other obligations under those laws.
- Enforcing our rights, including undertaking debt collection activities and legal proceedings.

## TRANSFER OF INFORMATION OVERSEAS

Help Enterprises is unlikely to disclose personal information to overseas recipients. Personal information will only be disclosed by Help Enterprises to overseas recipients in accordance with Australian Privacy Principle 8, such as where the individual consents to the disclosure or if the disclosure is required by Australian law.

## SECURITY AND STORAGE

Help Enterprises is committed to ensuring the security of all personal information of our customers, clients and others who we deal with which we hold.

Help Enterprises takes all reasonable steps to protect against the loss, misuse, alteration and unauthorised access to or disclosure of personal information under our control. These steps include:

- Holding all personal information in electronic form on secure servers in controlled facilities;
- Ensuring personal information contained in our electronic environment is password protected and only accessible by authorised staff with appropriate clearance levels;
- Holding all hard copy documentation provided to us in safe and secure storage and ensuring it is accessible only to authorised staff;
- Destroying and/or de-identifying all personal information which is no longer required by us or required to be maintained in a secure and safe manner;
- Regularly conducting internal audits and reviews to ensure compliance; and
- Regularly training staff in data handling procedures.

## ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

Help Enterprises is committed to and takes all reasonable steps in respect of maintaining accurate, timely, relevant, complete and appropriate information about our customers, clients and web-site users.

You may request access to personal information about you held by Help Enterprises. If you would like access to the personal information we hold about you, please contact the Help Enterprises' Privacy Officer:

Help Enterprises' Privacy Officer  
520 Curtin Avenue East  
Eagle Farm QLD 4009  
Telephone: 07 3868 9856  
Email: [Privacy.Officer@helpenterprises.com.au](mailto:Privacy.Officer@helpenterprises.com.au)

Please note Help Enterprises does require that, as part of any request by an individual for access to personal information, the individual verify their identity so that Help Enterprises may be satisfied that the request for access is being made by the individual concerned.

If any of the personal information that Help Enterprises holds about you is incorrect, incomplete or out of date, please let us know by contacting Help Enterprises' Privacy Officer.

## COMPLAINTS

If you have a complaint about a breach of the APPs by Help Enterprises in relation to your personal information, please contact the Help Enterprises' Privacy Officer via the details above.

The first step is to lodge your complaint to Help Enterprises in writing. Help Enterprises takes any complaint regarding the privacy of personal information seriously and will work with you to try to resolve the complaint. Help Enterprises will consider and respond to a written complaint within a reasonable time (usually 30 days).

If your complaint still remains unresolved, you may take your complaint to the Office of the Australian Information Commissioner. The contact details for the Office of the Australian Information Commissioner can be found via its website located at [www.oiac.gov.au](http://www.oiac.gov.au) and are also listed below:

Office of the Australian Information Commissioner

Telephone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Facsimile: +61 2 9284 9666

Post:

Sydney Office

GPO Box 5218

SYDNEY NSW 2001

## CHANGES TO PUBLIC PRIVACY POLICY

If Help Enterprises decides to or is required to change its Public Privacy Policy, we will notify you of such amendments via our website so that users are always aware of what information is collected by us, how it is used and the way in which information may be disclosed. As a result, please refer back to this Public Privacy Policy regularly to review any amendments.