

## **Privacy**

### **Policy**

#### **Purpose Real Estate:**

- is committed to protecting the privacy of personal information (information which directly or indirectly identifies a person) it collects, holds and administers in accordance with the eleven information privacy principles of the Information Privacy Act 2009
- 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
- will ensure that personal information collected is accurate, up to date and complete
- will amend information as necessary
- will ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered including the exceptions or limitations to confidentiality when warranted
- will only collect, use and disclose personal information for primary functions or a directly related purpose, or for another purpose with the person’s consent
- will store personal information securely, protecting it from unauthorised access
- will provide stakeholders with access to their own information, and the right to seek its correction
- will ensure that these privacy values are reflected in and supported by Purpose Real Estate’s core values and philosophies.

This information should be given before the information is collected or, if that is not practicable, as soon as possible after the collection.

#### **Limitations to confidentiality**

Maintaining client’s confidentiality provides the client with safety and privacy and protects their autonomy. There are however, exceptional circumstances in which a worker believes that serious harm may occur to the client or to other people, or that damage will occur to property, or that the client’s action will have an avoidable destructive impact on the company.

In such circumstances a decision to break confidentiality should be discussed with the client and should be made only after consultation with the Managing Director.

Any disclosure of confidential information will be restricted to relevant information, conveyed only to appropriate people and for appropriate reasons that are likely to alleviate the exceptional circumstances. Consideration will be given to achieving a

balance between acting in the best interests of the client and the worker's responsibilities to the wider community.

## **Procedures**

### **Collection**

#### **Purpose Real Estate will:**

- only collect information that is necessary for the performance and primary function of Purpose Real Estate
- collection of such information will be done in a respectful way and not constitute an unreasonable intrusion into the client's personal affairs
- notify stakeholders about why we collect the information and how it is administered
- notify stakeholders that this information is accessible to them.

### **Use and Disclosure**

#### **Purpose Real Estate will:**

- only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose
- for other uses, Purpose Real Estate obtain consent from the affected person.

### **Data Quality**

#### **Purpose Real Estate will:**

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

### **Data Security and Retention**

#### **Purpose Real Estate will:**

- all data and processing resources, other than data defined as public, which is accessible to all identified and authenticated users are only accessible on a need to know basis to specifically identified, authenticated, and authorised entities. All data and processing resources remain the property of Purpose Real Estate
- safeguard the information we collect and store against misuse, loss, unauthorised access and modification
- only destroy records in accordance with the organisation's Records Management Policy.

## **Openness**

### **Purpose Real Estate will:**

- ensure stakeholders are aware of Purpose Real Estate's Privacy Policy and its purposes.
- make this information freely available in relevant publications and on the organisation's website.

## **Access and Correction**

### **Purpose Real Estate 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.
- individuals will have the right to receive copies of original documents provided the originals are retained on file.
- individual will have the right to sight their personal information but only at the Purpose Real Estate offices.

## **Anonymity**

### **Purpose Real Estate will:**

- give stakeholders the option of not identifying themselves when completing evaluation forms or opinion surveys.

## **Making information available to other organisations**

### **Purpose Real Estate can:**

- only release personal information about a person with that person's express permission. For personal information to be released, the person concerned must sign a release form
- can release information to third parties where it is requested by the person concerned.

## **Protection of Personal Information**

Purpose Real Estate 's commitment to the principles of information privacy ensure that all personal information collected is protected from loss or unauthorised access by securing it in lockable cabinets and password protected computer files.

## **Use of personal information**

All personal information collected by Purpose Real Estate from applicants, tenants or clients remains confidential and will only be used for the purpose for which it was collected. This information includes personal information collected from housing applicants, clients seeking tenancy advice, and lessors.

Tenants' personal information is not given to lessors without the prior consent of the tenant/s.

Lessor, tenant or client names are not used in minutes of meetings without the prior consent of the persons concerned.

Non-identifying data may be extrapolated from personal information collected, to be used for:

- research
- reporting purposes
- evidence of housing needs
- trend reporting
- planning.

If non-identifying data is drawn from the information collected, the client will be informed of this use.

In the event of Purpose Real Estate ceasing operations as a service provider, tenants' written consent will be sought before their personal information is shared with another service provider.

## **Disclosure of Personal Information**

**Personal information will only be disclosed where Purpose Real Estate has a signed:**

- Information Release Form
- Authority to Act Form
- agreement between Purpose Real Estate and a support agency and tenant or client.

Only those parts of the personal information that are directly relevant to fulfilling the particular client/tenant focused purpose will be disclosed.

## **Access**

If Purpose Real Estate a client or tenant wishes to access their personal information they have the right to view original documents or electronic files at the company's office premises.

Original documents must remain at Purpose Real Estate. However, upon request from a client/tenant, copies of files/information relating to that client/tenant can be provided.

Originals and copies of an individual client's/tenant's file cannot be sighted or provided to anyone other than the client.

## **Responsibilities**

Purpose Real Estate's Board is responsible for developing, adopting and reviewing this policy.

Purpose Real Estate's Managing Director 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.

All Directors, staff, students and volunteers are required to sign a confidentiality statement on commencement with Purpose Real Estate. Non-compliance with the privacy principles will be dealt with by enacting the grievance procedures and, in the case of employees, may result in termination of employment.