

BlueCHP Privacy Policy

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1. Policy Brief and Purpose

This policy sets out how BlueCHP Limited (BlueCHP) collects, uses, discloses and manages your personal information and how BlueCHP complies with the Privacy Act 1988 (Cth) and the thirteen (13) Australian Privacy Principles (APPs) (refer Annexure 1).

Any personal information from outside Australia will be treated in accordance with the applicable law. Privacy is important because there is an expectation and a legal obligation for BlueCHP to handle your personal information properly and securely.

2. What Is Personal Information and What Personal Information Do We Collect?

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 personally identify you. If the information BlueCHP collects personally identifies you, or you are reasonably identifiable from it, the information will be considered to be personal information. The types of information that BlueCHP may collect about you include:

- Personal Information - names, contact details (addresses, phone numbers, email addresses), dates of birth, government issued identification numbers (e.g. tax file number, NDIS number) next of kin details, financial information, images and photographs, employment details including occupation or profession and education information.
- Sensitive Information (particularly in relation to providing appropriate housing services and our work health and safety obligations) - is a subset of personal information and includes but is not limited to religious beliefs, nationality, country of birth, languages spoken at home, family court orders and criminal records.
- Health Information (particularly in relation to providing appropriate housing services and complying with our work health and safety obligations) - is a subset of sensitive information and includes but is not limited to information regarding medical records, disabilities, individual health care plans and counselling reports.

BlueCHP will only collect personal information from you that is reasonable and necessary for us to provide you with the most appropriate accommodation for your needs.

If BlueCHP needs personal information from you that is considered sensitive, including health information, we will request your consent in writing. We will only request to collect sensitive information from you if it is reasonable and necessary for us to provide our service to you.

If BlueCHP were to receive personal information about you that we did not collect or request from you and the information is not reasonable and necessary for us to conduct business on your behalf, BlueCHP will make every reasonable effort to destroy this information.

BlueCHP will only use the personal information that we have collected from you for the main purpose for which it was collected. We will not use or disclose this information for any other purpose.

3. How Does BlueCHP Collect Your Information?

BlueCHP will collect your personal information directly from you unless it is unreasonable or impracticable to do so. Where possible we have standardised the collection of personal information by using specific forms. However, given the nature of our operations, we often also receive personal information by email, letters, notes, over the telephone, in face-to-face meetings and through financial transactions.

We may also collect your personal information in other ways including:

- through your access and use of our website;
- through your enrolment and participation in feedback or surveys;
- during conversations between you and our representatives.

We may collect personal information from other people for example, referring agencies, sub-contractors, service providers including health service providers, partner agencies and publicly available sources such as social media. However we will only do so where it is not reasonable and practical to collect the information from you directly and will take reasonable steps to notify you, or otherwise ensure that you are aware that BlueCHP collects or has collected the information and of the circumstance and purpose for which your personal information was collected.

4. What Happens If BlueCHP Cannot Collect Your Personal Information

If you decide not to provide BlueCHP with the personal information described above, some or all of the following may happen:

- BlueCHP may not be able to provide you with information about the products and services that you may want; or
- BlueCHP may not be able to provide a requested response to your feedback or comment;

5. For What Purposes does BlueCHP Collect, Hold, Use and Disclose Your Personal Information?

BlueCHP is a charitable organisation registered under the Australian Charity & Not-for-profit Commission. We are a developer and provider of affordable accommodation. We are also a Tier 1 community housing provider registered under the National Regulatory Scheme for Community Housing ("NRSCH"). BlueCHP is also registered with the National Disability Insurance Scheme (NDIS) as a Specialist Disability Accommodation (SDA) provider.

BlueCHP collects personal information in order to carry on its business, to provide property-related products and services, to improve our products and services and to communicate with our customers and investors.

Your personal information may be disclosed between related bodies corporate of BlueCHP and used by those entities for the same purposes for which the information was collected. Your personal information, including sensitive and health information, may be shared with external support services if you have given BlueCHP consent to do so. Your personal information will not be shared, sold, rented or disclosed other than as described in this policy.

6. Direct Marketing Communications

BlueCHP may use or disclose the personal information we collect from you to send you direct marketing communications and information about products and services that we consider may be of interest to you because they are in line with the services or products for which we collected your personal information. BlueCHP will not use or disclose your sensitive information for the purpose of direct marketing unless we first obtain your permission.

Direct marketing communications may be sent in various forms, including by telephone, text message, post and email. If you indicate a preference for a method of communication, we will try to use that method whenever practical to do so.

7. How Can You Opt-Out Of Marketing Communications?

In written marketing communications BlueCHP will always provide a clear and prominent statement indicating your right to not receive further communications and how you can opt-out of direct marketing communications about our products and services. If BlueCHP contacts you by phone for the purpose of direct marketing, we will inform you that you have the right to request a stop to further direct marketing. In addition, at any time you may opt-out of receiving marketing communications from BlueCHP by contacting our Privacy Officer (Annexure 2).

Please note that if BlueCHP is currently providing you with services or products, we will still need to send you essential information about your application, the relevant services or products and other information required by law.

8. To Whom does BlueCHP Disclose Personal Information?

BlueCHP will only disclose your personal information in the circumstances stated below. BlueCHP takes reasonable steps to ensure that third-party recipients do not use personal information for their own purposes and that those parties comply with BlueCHP's privacy policy.

BlueCHP may disclose your personal information to government agencies, our service providers, agents, contractors, partner support agencies, business partners and other recipients from time to time, only if one or more of the following apply:

- you have consented;
- you would reasonably expect us to use or disclose your personal information in this way and for the purpose it was collected;

There are circumstances where it is possible we would be required to disclose your personal information in exceptional circumstances and these include:

1. Where the information is required or authorised by or under Australian law or a court/tribunal order; or
2. Where there is a permitted general situation. Permitted general situations include and require action to:
 - a) Reduce or prevent a serious threat to the life, health or safety of any individual, or to public health or safety.
 - b) Take appropriate action in relation to suspected unlawful activity or serious misconduct.
 - c) Locate a person reported as missing.
 - d) Establish a legal or equitable claim.
 - e) Conduct an alternative dispute resolution process.
3. Where there is a permitted health situation; or
4. Where we reasonably believe that your information is reasonably necessary for enforcement related activities conducted by an enforcement body.

9. Confidentiality and Security of Information

BlueCHP is committed to:

- safeguarding all personal information;
- ensuring that personal information remains confidential and secure;
- taking all reasonable steps to ensure that personal privacy is protected and respected.

BlueCHP maintains physical, electronic and procedural safeguards to protect personal information from misuse, interference, unauthorised access, modification, disclosure, loss or corruption by computer viruses and other sources of harm. Access to personal information is restricted to those employees, subsidiary companies and third-parties who need to know that information to achieve the primary purposes for which the information was collected.

10. Access and Correction of Personal Information

Where we hold information about you that you are entitled to access and you request that information, we will provide you with the information in the form you request that is reasonable and practicable (for example, by mailing or emailing it to you). There may be instances where we cannot grant you access to the personal information we hold. For example, we may refuse access if granting access would interfere with the privacy of others or it would result in a breach of confidentiality. If that happens, we will give you written reasons for the refusal within a reasonable timeframe as well as our complaints and appeals policy in case you wish to make a complaint in response to the refusal. If we cannot provide you with the specific document/information requested for reasons set out in Australian Privacy Principle 12, BlueCHP will try to provide you with that information from other documentation that contains your personal information.

From time-to-time BlueCHP may contact you to update your personal information.

This is to ensure the quality of the personal information we hold, that it is accurate, up-to-date and complete. We are required by law to keep the information we collect current.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request that we amend it. If you wish to update your personal information that BlueCHP holds, please advise the BlueCHP Privacy Officer (Annexure 2). Depending on the nature

of the request, we may ask you to verify your identity and to submit your request in writing. In some unusual cases, we may not agree that there are grounds for amending your personal information. In these situations BlueCHP will provide you with our complaints policy and procedure in case you wish to make a complaint in response to the refusal to correct information.

When we no longer need your personal information, if the information is not contained in a Commonwealth record and we do not need to retain the information according to Australian Law or a court/tribunal, BlueCHP will make every reasonable effort to destroy or de-identify your information.

11. What Is The Process for Complaining about a Breach of Privacy?

If you wish to make a complaint about a breach of your privacy by BlueCHP, you may do so by providing your written complaint by email, letter or by personal delivery to the BlueCHP Privacy Officer (Annexure 2)

We will respond to your complaint according to the BlueCHP Limited Complaints and Appeals Policy as soon as reasonably possible and preferably within fifteen (15) business days of receipt of the complaint. We may seek further information from you to provide a full and complete response.

If you are not satisfied with BlueCHP's response, you can appeal the outcome according to the BlueCHP Complaints and Appeals Policy. Furthermore the complaint can be referred to the Office of the Australian Information Commissioner (OAIC; Annexure 3). The OAIC will generally only consider a complaint if it was first submitted to BlueCHP and we were given reasonable opportunity to resolve the complaint (usually 30 days).

12. Changes to the BlueCHP Privacy Policy

BlueCHP reserves the right to modify or amend this privacy policy at any time and will update the privacy policy on our website after it has been changed. If you have any further questions about BlueCHP's privacy policy, please contact BlueCHP's Privacy Officer.

13. Key Relevant Documents

BlueCHP Complaints and Appeals Policy
 Privacy Act 1988 (Cth) Sch 1 - Australian Privacy Principles
 Privacy Act 1988 (Cth) Sch 1 Pt 1 - Consideration of personal information privacy
 Privacy Act 1988 (Cth) Sch 1 Pt 2 - Collection of personal information
 Privacy Act 1988 (Cth) Sch 1 Pt 3 - Dealing with personal information
 Privacy Act 1988 (Cth) Sch 1 Pt 4 - Integrity of personal information
 Privacy Act 1988 (Cth) Sch 1 Pt 5 - Access to, and correction of, personal information.

Annexure 1: Australian Privacy Principles (APP)

Australian Privacy Principles (APP)

APP 1 — Open and transparent management of personal information
 Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.

APP 2 — Anonymity and pseudonymity
 Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.

APP 3 — Collection of solicited personal information
 Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of 'sensitive' information.

APP 4 — Dealing with unsolicited personal information
 Outlines how APP entities must deal with unsolicited personal information.

APP 5 — Notification of the collection of personal information
 Outlines when and in what circumstances an APP entity that collects personal information must notify an individual of certain matters.

APP 6 — Use or disclosure of personal information
 Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.

APP 7 — Direct marketing

An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.

APP 8 — Cross-border disclosure of personal information

Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.

APP 9 — Adoption, use or disclosure of government related identifiers

Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier of an individual.

APP 10 — Quality of personal information

An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

APP 11 — Security of personal information

An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.

APP 12 — Access to personal information

Outlines an APP entity's obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.

APP 13 — Correction of personal information

Outlines an APP entity's obligations in relation to correcting the personal information it holds about individuals.

Annexure 2: BlueCHP Privacy Officer

You may contact our Privacy Officer in the following ways:

In writing: Privacy Officer, BlueCHP Limited
PO BOX 315X LEUMEAH NSW 2560

In Person: Suite 3a, 12 O'Sullivan Road, LEUMEAH NSW 2560

By Email: office@bluechp.com.au

By Phone: (02) 4621 8600

Annexure 3: Office of the Australian Information Commissioner

You may contact the Office of the Australian Information Commissioner (OAIC) in the following ways:

In writing: GPO Box 5288
SYDNEY NSW 2001

By Phone: 1300 363 992 (Monday to Thursday 10am to 4pm (AEST/AEDT))

By Online Enquiry Form: Visit <https://www.oaic.gov.au/contact-us>

By Fax: 02 6123 5145