



geelong
chamber of commerce
THE VOICE OF BUSINESS

PRIVACY AND CREDIT REPORTING POLICY

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1. PURPOSE OF THIS POLICY

- 1.1. This Policy details how we comply with the *Privacy Act*, including:
 - 1.1.1. the *APPs* which regulate how we collect, use, disclose and store Information; and
 - 1.1.2. the *Credit Reporting Privacy Code* which governs credit reporting.
- 1.2. This *Policy* does not apply to the collection or use of *Information* about corporations.
- 1.3. If you would like a hardcopy of this Policy, please contact our CEO on 03 5222 5534.

2. DEFINITIONS

- 2.1. **APPs** means the Australian Privacy Principles introduced under the *Privacy Act*;
- 2.2. **Corporate Partners** means members of The Geelong Chamber of Commerce that are a company, partnership, business, firm or other legal entity and that subscribe to the special membership category of Corporate Partner
- 2.3. **Credit Related Information** is used in this Policy to describe Credit Information, as defined in the *Privacy Act*, including, where the context requires, information obtained from, or given to, Credit Reporting Bodies;
- 2.4. **Credit Reporting Bodies** means agencies or organisations that are involved with collecting, holding, using or disclosing Information for the purposes of providing an entity with information about the credit worthiness of an individual;
- 2.5. **GBEA** means the Geelong Business Excellence Awards;
- 2.6. **Information** is used in this Policy to describe *Personal Information*, *Sensitive Information* and *Credit Related Information* collectively;
- 2.7. **Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable:
 - 2.7.1. whether the information or opinion is true or not; and
 - 2.7.2. whether the information or opinion is recorded in a material form or not;
- 2.8. **Privacy Act** means the *Privacy Act 1988 (Cth)* as amended from time to time;
- 2.9. **Sensitive Information** is defined in the *Privacy Act* to include things such as race, sexual orientation, political opinions, members of a trade association or trade union, criminal record or health information.
- 2.10. **Sponsors** means businesses that sponsor events and other initiatives conducted by us.

3. THE TYPE OF INFORMATION WE COLLECT

3.1. Personal Information

Personal Information that we collect and hold is information that is reasonably necessary for the proper performance of our functions and activities as a supplier of services.

While the type of *Personal Information* we collect and hold may vary depending on the nature of our interactions with you, generally it will include the following:

- 3.1.1. identification information, such as your name, date of birth and address;
- 3.1.2. contact information, such as telephone numbers and e-mail addresses;
- 3.1.3. credit information, such as details relating to credit history, credit capacity, and eligibility for credit;
- 3.1.4. credit card information.

3.2. Sensitive Information

We may at times, subject to this Policy, also collect and hold *Sensitive Information*.

3.3. Credit Related Information

The type of *Credit Related Information* we collect and hold includes:

- 3.3.1. scores, ratings, summaries, evaluations and other information relating to your credit history;
- 3.3.2. certain administrative information relating to credit;
- 3.3.3. information which has bearing on your creditworthiness which is relevant to evaluating your eligibility for membership and credit, such as:
 - 3.3.3.1. insolvency information;
 - 3.3.3.2. credit infringement information;
 - 3.3.3.3. court judgments made in relation to your past or present credit arrangements.

4. COLLECTION

We collect Information only by fair and lawful means where it is reasonable and practicable to do so. We do so in order to conduct our business, to provide accurate information to you, to market our services and to meet our legal obligations.

If you do not provide us with *Information* we reasonably request, we may not be able to provide our services to you or other membership benefits in the most efficient manner possible, or at all.

4.1. How we Collect Information

4.1.1. We collect *Information* that you provide:

- 4.1.1.1. when visiting our website at www.geelongchamber.com.au;

- 4.1.1.2. when visiting the GBEA website at www.gbea.com.au;
- 4.1.1.3. during telephone, or in person, conversations with us;
- 4.1.1.4. through transactions conducted with us; and
- 4.1.1.5. in written correspondence to us (including email correspondence).

4.1.2. We also collect *Information* provided by third parties when it is necessary for a specific purpose, such as checking *Information* that you have given us or where you have consented, or would reasonably expect us to collect your *Information* in this way.

4.1.3. If it is unclear to us whether you have consented to the collection of *Information* from a third party, we will take reasonable steps to contact you to ensure that you are aware of the reason and purpose of the collection.

4.1.4. Where we collect *Information* from a third party, if it is reasonably possible we will inform you that the *Information* has been collected and the circumstances of the collection.

4.1.5. We will also collect *Information* about you if we are required to do so by law. If so, we will inform you of this, including details of the law requiring the collection.

4.1.6. We may also collect *Information* about you from a range of publicly available sources including newspapers, journals, directories, the internet and social media sites.

4.2. Internet Usage

It is important that you understand that there are risks associated with use of the internet and you should take all appropriate steps to protect your *Information*. You can contact us by land line telephone or post if you have concerns about making contact via the internet.

We may use cookies when you visit our website (www.geelongchamber.com.au) or the GBEA website (www.gbea.com.au) and, as a consequence, we may collect certain *Information* from you such as:

- 4.2.1. your browser type;
- 4.2.2. your location;
- 4.2.3. your IP address;
- 4.2.4. information about when and how you use our website;
- 4.2.5. information about your past internet usage, such as websites you visit before coming to our website.

4.3. Unsolicited Information

Where we receive unsolicited *Information* about you, we will check whether that *Information* is reasonably necessary for our functions. If it is, we will handle this *Information* in the same way we do other *Information* we seek from you. If not, we will destroy or de-identify it.

5. REASON FOR COLLECTION, DISCLOSURE & USE

5.1. Personal Information

We may use and disclose your *Personal Information* for the primary purpose for which it is collected, for reasonably expected secondary purposes which are related to the primary purpose, and in other circumstances authorised by the *Privacy Act*. In general, we use and disclose your *Personal Information* to:

- 5.1.1. conduct our business;
- 5.1.2. provide our services and membership benefits to you;
- 5.1.3. market our business and services;
- 5.1.4. communicate with you and assist you with enquiries;
- 5.1.5. comply with our legal obligations;
- 5.1.6. help us manage and enhance our service standards;
- 5.1.7. gain an understanding of your needs; and
- 5.1.8. improve your online experience with us.

5.2. Sensitive Information

We will not collect *Sensitive Information* about you unless:

- 5.2.1. we obtain your explicit consent to collect and use such *Sensitive Information*; or
- 5.2.2. the *Sensitive Information* is reasonably necessary for one or more of our functions or activities; or
- 5.2.3. the collection of the *Sensitive Information* is required or authorised by law or a court/tribunal order; or
- 5.2.4. a permitted general situation exists in relation to the collection of the *Sensitive Information* by us; or
- 5.2.5. a permitted health situation exists in relation to the collection of the *Sensitive Information* by us.

5.3. Credit Related Information

5.3.1. We collect, use and hold your *Credit Related Information*:

- 5.3.1.1. to determine payment terms for your membership fee and the services we provide;
- 5.3.1.2. for day to day administration purposes; and
- 5.3.1.3. to satisfy our legal obligations.

5.3.2. In addition, we use *Credit Related Information* that we obtain from *Credit Reporting Bodies* to derive information in relation to your creditworthiness and eligibility for credit. This is known as "*Credit Eligibility Information*".

5.3.3. We may disclose *Credit Related Information* about you to *Credit Reporting Bodies* and debt collection companies where you are in payment default. We will only make a disclosure in these circumstances if we have given you written notice of our intention to disclose and at least 14 days has passed since giving you such notice.

The types of *Credit Related Information* that we may disclose includes:

5.3.3.1. identification information; and

5.3.3.2. information that you have defaulted on a payment due to us and the amount and details of the default.

Subject to paragraphs 5.3.1, 5.3.2 and 5.3.3, we will not disclose *Credit Related Information*, including *Credit Eligibility Information*, about you unless you have authorised the disclosure or it is otherwise in accordance with the law.

6. **MARKETING**

We may use and/or disclose your *Information* in order to:

6.1. provide you with news and information about our services, membership benefits, *Sponsors*, *Corporate Partners* and our business generally;

6.2. provide you with marketing and promotional material that we believe you may be interested in; or

6.3. seek your feedback on our services.

Only with your express consent will we use or disclose *Information* about you for the purposes of direct marketing. You can ask us not to do this at any time by writing to our CEO.

We will not sell your *Information*.

7. **SECURITY & MANAGEMENT**

We take reasonable steps to protect your *Information* against misuse, interference, loss, unauthorised access, modification and disclosure. The protective steps we take include:

7.1. confidentiality requirements of our employees and subcontractors;

7.2. limiting access to *Information* to employees who have a need to use the *Information*;

7.3. educating our employees in relation to obligations under the *Privacy Act*;

7.4. document storage security policies;

7.5. security measures for restricted access to our systems; and

7.6. deletion, destruction or de-identification of Information where it is no longer required by us.

8. CORRECTION

We aim to ensure that the *Information* we hold is accurate, complete and up-to-date. We encourage you to contact us in order to update any Information we hold about you. Our contact details are set out at the end of this Policy.

If you contact us regarding an apparent inaccuracy in relation to your *Information* and we are satisfied that the *Information* is inaccurate, out-of-date, incomplete, irrelevant or misleading, then reasonable steps will be taken to correct the Information within 30 days, or a longer period as we agree with you in writing.

We will not charge you for a correction.

If we determine that the correction is not required, we will provide you with written notice stating the reasons why the correction was not made and refer you to our complaints procedure.

If a correction is made to any *Information* that was previously disclosed to a third party, as long as it is reasonable to do so, we will give each such recipient written notice of the correction within a reasonable period. We will also notify you that the correction has been made.

9. ACCESS TO YOUR INFORMATION

You are entitled to access your *Information* held by us.

If you wish to access your Information, you must lodge a request for access by contacting our CEO by email on bernadette.uzelac@geelongchamber.com.au, or by post to Suite 13, Level 2, 10 Moorabool Street, Geelong, Victoria 3220.

We may charge a fee to cover our reasonable costs in meeting an access request. You will be provided with access to your *Information* within 30 days of the request (unless unusual circumstances apply).

We are not required to give you access to your *Information* if:

9.1. it would be unlawful to do so; or

9.2. denying access is required or authorised by law or a court/tribunal order; or

9.3. to do so would likely prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

If we do not give you access to your *Information* you will receive written notice that explains the reason for the refusal.

10. ACCESS TO THIS POLICY & FURTHER INFORMATION

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment.

The most current version of this Policy is uploaded to our website at www.geelongchamber.com.au or can be obtained by contacting our CEO:

E-Mail: bernadette.uzelac@geelongchamber.com.au

Phone: 03 5222 5534

Facsimile: 03 5222 2235

Postal Address: Suite 13
Level 2
10 Moorabool Street
Geelong, Victoria 3220

If you have any questions about privacy-related issues please contact our CEO.

For further information about privacy, the protection of privacy and credit reporting can also be found on visit the Office of the Australian Information Commissioner's website at www.oaic.gov.au.

11. COMPLAINTS

Complaints about alleged breaches by us of the *Privacy Act*, the *APPs*, the *Credit Reporting Privacy Code* or this Policy can be made by contacting our CEO by email on bernadette.uzelac@geelongchamber.com.au. If you do not consider that your complaint has been adequately dealt with by us, you may make a further complaint to the Office of the Australian Information Commissioner, which has complaint handling responsibilities under the *Privacy Act*.

12. REVIEW

This procedure is to be reviewed by 07 September 2017.