

Privacy Policy

Pharos HR Pty Ltd t/as Bastion Systems

29 October 2024



PRIVACY POLICY

1. INTRODUCTION

The Board of Pharos HR Pty Ltd (**Pharos HR**) is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information will not be used by Pharos HR in any way with which it was not intended to be used and collected data will be held securely. Any such personal information that Pharos HR collects, holds or administers will be handled in accordance with the *Privacy Act 1998* (Cth), which contains the Australian Privacy Principles (**APPs**), and other applicable state and territory laws.

1.1 Definitions

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

Sensitive information is a special category of personal information. Sensitive information means:

- (a) information or an opinion about an individual's (i) racial or ethnic origin, (ii) political opinions, (iii) membership of a political association, (iv) religious beliefs or affiliations, (v) philosophical beliefs, (vi) membership of a professional or trade association, (vii) membership of a trade union, (viii) sexual orientation or practices, (ix) criminal record, that is also personal information;
- (b) health information about an individual;
- (c) genetic information about an individual that is not otherwise health information; and
- (d) biometric information, including information based on personal attributes such as fingerprints, DNA, iris, facial features, hand geometry and voice, that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

2. PURPOSE

The purpose of this document is to provide a framework for Pharos HR in dealing with privacy considerations.

3. POLICY

Bastion Systems collects and administers a range of personal information for the purposes of church administration and support. The organisation is committed to protecting the privacy of personal information it collects, holds and administers.

Pharos HR 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. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the Privacy Act 1988 (Cth).

Pharos HR is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information. Pharos HR will:

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

PRIVACY PROCEDURES

1. Responsibilities

Pharos HR's Board is responsible for developing, adopting and reviewing this policy.

Pharos HR's CEO 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.

2. Processes

2.1 Collection

Pharos HR will:

- Only collect information that is necessary for the performance and primary function of Pharos HR;
- Notify stakeholders about why we collect the information and how it is administered;
- Notify stakeholders that this information is accessible to them;
- Collect personal information from the person themselves wherever possible;
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected;
- Collect Sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others); and
- Determine, where unsolicited information is received, whether the personal information could have collected it in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

2.2 Use and Disclosure

Pharos HR will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose;
- For other uses, Pharos HR will obtain consent from the affected person;
- In relation to a secondary purpose, use or disclose the personal information only where:
 - A secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
 - The person has consented; or

- Certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and Pharos HR has provided an opt out and the opt out has not been taken up;
- In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out);
- State in Pharos HR's privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as Pharos HR is required to be;
- Provide all individuals access to personal information except where it is a threat to life or health or it is authorized by law to refuse and, if a person is able to establish that the personal information is not accurate, then Pharos HR must take steps to correct it. Pharos HR may allow a person to attach a statement to their information if Pharos HR disagrees it is inaccurate;
- Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties; and
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

2.3 Storage

Pharos HR will:

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure;
- Before Pharos HR discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. Pharos HR will have systems which provide sufficient security; and
- Ensure that Pharos HR's data is up to date, accurate and complete.

2.4 Destruction and de-identification

Pharos HR will:

- Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones; and
- Change information to a pseudonym or treat it anonymously if required by the person whose information Pharos HR holds and will not use any

government related identifiers unless they are reasonably necessary for our functions.

2.5 Data Quality

Pharos HR will:

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

2.6 Data Security and Retention

Pharos HR will:

- Only destroy records in accordance with the organisation's Records Management Policy.

2.7 Openness

Pharos HR will:

- Ensure stakeholders are aware of Pharos HR's Privacy Policy and its purposes; and
- Make this information freely available in relevant publications and on the organisation's website.

2.8 Access and Correction

Pharos HR 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.

2.9 Anonymity

Pharos HR will:

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

2.10 Making information available to other organisations

Pharos HR can:

- Release information to third parties where it is requested by the person concerned.

PRIVACY POLICY – FOR EXTERNAL USE/PRIVACY ACT COMPLIANCE

1. Your privacy is important

This statement outlines Pharos HR's policy on how Pharos HR uses and manages personal information provided to or collected by it.

Pharos HR is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Pharos HR may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Pharos HR's operations and practices and to make sure it remains appropriate to the changing legal environment.

2. What kind of personal information does Pharos HR collect and how does Pharos HR collect it?

The type of information Pharos HR collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Individuals' health records;
- Individuals' finances; and
- Individuals' contact details.

3. Personal Information you provide:

Pharos HR will generally collect personal information held about an individual by way of phone calls, forms, meetings etc. You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

4. Personal Information provided by other people:

In some circumstances Pharos HR may be provided with personal information about an individual from a third party.

5. In relation to employee records:

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to Pharos HR's treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Pharos HR and employee. However, Pharos HR must provide access and ensure compliance with the Health Privacy Principles under the Victorian Health Records Act 2001.

6. How will Pharos HR use the personal information you provide?

Pharos HR will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, Pharos HR will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere we will still send you direct marketing information where you have consented and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

We may use video surveillance for security purposes and the footage will be used only by Pharos HR and by the providers of our security services for security purposes. Surveillance videos are not used by Pharos HR for other purposes and the footage is not publicly available. Surveillance cameras are not located in any bathrooms or change room facilities.

7. Job applicants, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, Pharos HR's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which Pharos HR uses personal information of job applicants, staff members and contractors include:

- For insurance purposes;
- For recruitment and screening purposes;
- For HR and people management purposes; and
- To satisfy Pharos HR's legal obligations.

Where Pharos HR receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

8. Volunteers:

Pharos HR also obtains personal information about volunteers who assist Pharos HR in its functions or conduct associated activities, such as to enable the Pharos HR and the volunteers to work together.

9. Marketing and fundraising:

Personal information held by Pharos HR may be disclosed to an organisation that assists in Pharos HR's fundraising.

10. Who might Pharos HR disclose personal information to?

Pharos HR may disclose personal information, including sensitive information, held about an individual to:

- Government departments and authorities as required;
- People providing services to Pharos HR; and
- Anyone you authorise Pharos HR to disclose information to.

11. Sending information overseas:

Pharos HR will not send personal information about an individual outside Australia without:

- Obtaining the consent of the individual (in some cases this consent will be implied); or
- Otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

We do not use overseas providers of IT services including servers and cloud services.

12. How does Pharos HR treat sensitive information?

In referring to 'sensitive information', Pharos HR means:

"information relating to a person's racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual".

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

13. Management and security of personal information

Pharos HR's staff are required to respect the confidentiality of personal information and the privacy of individuals.

Pharos HR has in place steps to protect the personal information Pharos HR holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. We may also collect information about your IP address, although this may not identify you.

14. Updating personal information

Pharos HR endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by Pharos HR by contacting the Privacy Officer of Pharos HR at any time.

The Australian Privacy Principles and the Health Privacy Principles require Pharos HR not to store personal information longer than necessary. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what personal information Pharos HR holds about you.

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which Pharos HR holds about them and

to advise Pharos HR of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information Pharos HR holds about you, please contact the Privacy Officer in writing.

Pharos HR may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, Pharos HR may charge a fee to retrieve and copy any material. Pharos HR If the information sought is extensive, Pharos HR will advise the likely cost in advance.

15. How long will Pharos HR keep my information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

16. Enquiries and privacy complaints

If you would like further information about the way Pharos HR manages the personal information it holds, please contact the Privacy Officer. The privacy office can be contacted by email - **[Insert Email]**. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Privacy Officer who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting then you can refer your complaint to the Office of the Australian Information Commissioner via:

- email: enquiries@oaic.gov.au
- tel: 1300 363 992
- fax: +61 2 9284 9666