



Sydney Heritage Fleet Policy

Title *PRIVACY POLICY*

The new Australian Privacy Principles (APPs) commenced on 12 March 2014 under the Commonwealth Privacy Act 1988 (Privacy Act). This document incorporates the current changes.

Note: As a small business (turnover less than \$3m annually) Sydney Heritage Fleet is exempt from the operation of the Privacy Policy Act 1988. However, given that we hold private information, we plan to conform to the following Australian Privacy Policy Principles.

Scope of Policy *Whole of the organisation*

History

Version	Date	What was Changed or what was done	Author
0.1	01/9/01	Policy Created as Privacy Principles	
1.0	01/9/01	Policy Issued	
1.1	15/08/2014	Policy revised and circulated for comment	HL
1.2		Policy updated comments incorporated	HL
2.0	28/08/2014	Policy agreed by the Board	RM
2.1	17/09/2014	Policy issued	RM
3.0	30/04/2015	Policy updated for signature	RM

Responsibility and Further Information

Responsibility	Position	Phone	Email
Implementation	General Manager	9298 3840	rmuir@shf.org.au
Information	Receptionist	9298 3888	info@shf.org.au



Introduction

The Sydney Heritage Fleet is committed to respecting the privacy of your personal information even though we are exempt from the Privacy Policy Act 1988. This Policy sets out our personal information management practices. It covers the following areas:

- Compliance with the National Privacy Principles
- Personal information collected
- Use and disclosure of personal information
- Accessing and updating your personal information
- Security of personal information
- Contact details

Throughout this Policy, we refer to “you” and “your personal information” which means information which identifies you as an individual or from which your identity can be reasonably ascertained. Your name, address and telephone number are examples of personal information. References to “us”, “we” and “our” are references to the Sydney Heritage Fleet and references to “you” or “your” are references to Sydney Heritage Fleet employees, members, donors, sponsors, customers and volunteers.

Compliance with the National Privacy Principles

The National Privacy Principles under the Privacy Act 1988 have applied since 12th March 2014. Although not legally required to do so, Sydney Heritage Fleet will comply with these principles, and any applicable laws, to protect your privacy.

Principle 1 - Collection

We will not collect personal information unless the information is necessary for one or more of our functions and is collected in a lawful, fair and not unreasonably obtrusive manner. We will manage personal information according to a set of rules which can be made available to you.

Principle 2 - Use and Disclosure

We will only use personal information for the purpose for which it was collected. Other than for the following exceptions:

- where you have consented to other uses;
- where the secondary purpose for which the personal information will be used is related to the primary purpose and where you would reasonably expect the personal information to be used or disclosed in that way; and
- where we use non-sensitive personal information in direct marketing, fundraising etc. including for the Foundation, the Maritime Society and



Fleet events, subject to conditions, (which include a right for you to opt-out of further direct marketing after the first contact).

Principle 3 – Data Quality

We will take reasonable steps to ensure the accuracy and currency of personal information in our possession subject to you advising us of any material changes.

Principle 4 - Data Security

We will take reasonable steps to secure the personal information in our possession from misuse and loss and from unauthorised access, modification or disclosure, and will attempt to destroy or de-identify the information if it is no longer needed.

Principle 5 - Openness

We will have documented and accessible policies with regard to the management of personal information and must also inform you, upon request, of the sort of personal information that we hold, the purposes for which it is held and how the information is collected, held, used and disclosed.

Principle 6 - Access and Correction

We must provide you with access to personal information held about you, other than in exceptional circumstances, and incorporate processes for the correction of the information on your request, or if there is some disagreement as to the correction, allow a statement to be associated with the information noting that you desire a correction.

Principle 7 - Identifiers

In general terms we are prohibited from the use, for our own purposes, of identifiers assigned by Government agencies (such as tax file numbers, proof of Concession Status, Medicare numbers, Working with Children Certification, Certificates of Competency etc.) other than where this information is needed for staff management, membership and ticket discounts and for crewing on certain vessels.

Principle 8 - Sensitive Information

Other than in exceptional circumstances, we are not permitted to collect sensitive information, defined to mean information or an opinion (which is also personal information, as defined) about an individual's racial or ethnic origin; political opinion; membership of a political association; religious beliefs or affiliation; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual preferences or practices; criminal record; or health. Exceptional circumstances include where the individual has consented or where the collection is necessary for the protection of an individual who is physically incapable of giving or communicating consent or where an undertaking may be dangerous and require a Doctor's Certificate of clearance e.g. mast climbing on sea voyages on *James Craig*.



In addition to the above we may provide personal information to our service providers who assist us in providing our goods and services. These may include companies that assist the Sydney Heritage Fleet with data processing and analysis, research, mail services or maintenance. We will only disclose your personal information to those third party service providers on a confidential basis so that the service provider can effectively provide those services.

We may publish lists of contact details which may be available for limited circulation within our organisation. Examples include phone directories, crew lists and volunteer rosters. Members' information will appear in in-house publications e.g. our Annual Report, journals e.g. weekly Fleet Forum and quarterly The 6Mariner newsletters and website including acknowledgement of gifts or bequests. Please inform info@shf.org.au if you do not want your information used in this manner.

The only other way we may disclose your personal information is where such disclosure is required or authorised by law, which may include emergencies and assisting law enforcement agencies.

Accessing and Updating Your Personal Information

If you need to access or correct any personal information we hold about you, please contact us using the contact details set out below. We request that you provide us with as much detail as you can about the particular information you seek, in order to help us retrieve it. An access fee may be charged to cover our costs of providing that information to you. In certain circumstances, we may not be required by law to provide you with access or to correct your personal information. If that is the case, we will give you our reasons for that decision.

We take reasonable steps to make sure that the personal information we collect, use and disclose is accurate, complete and up-to-date but, where your personal circumstances have changed e.g. Change of address, email or phone numbers or where you have authorised regular debits from your Credit or Debit Card we rely on you to inform us of those changes.

Contact Details

If you have any questions or feedback about privacy, or wish to make a complaint about the way in which we have handled your personal information, please contact us at membership@shf.org.au or, in the first instance, by phone on 02 9298 3888

Agreed by Board of Directors date to be inserted



Sydney Heritage Fleet's Requirements for handling Privacy Issues

This policy refers to both electronic and hard copy personal information

1.1 We will ensure that we manage personal information in an open and transparent way and in compliance with our published Privacy Policy

1.2 We will take such steps as are reasonable in the circumstances to implement practices, procedures and systems relating to our functions or activities that:

- will ensure that we comply with the Australian Privacy Principles even though we are exempt from such requirements.
- and
- will enable us to deal with inquiries or complaints from individuals about the entity's compliance with the Australian Privacy Principles.

1.3 We will have a clearly expressed and up to date policy about the management of personal information by us.

1.4 Without limiting subclause 1.3, our privacy policy will contain the following information:

- the kinds of personal information we collect and hold;
- how we collect and hold personal information;
- the purposes for which we collect, hold, use and disclose personal information;
- how an individual may access personal information that we hold about that individual and seek the correction of such information;
- how an individual may complain about a breach of our Privacy Policy, and how we will deal with such a complaint.

1.5 We will take such steps, as are reasonable in the circumstances, to make our Privacy Policy available:

- free of charge;
- and
- in such form as is appropriate.

Note: We will consider making our Privacy Policy available on our website.

1.6 If a person or body requests a copy of our Privacy Policy we will take such steps as are reasonable in the circumstances to give the person or body a copy of that Policy.

1.7 All Staff, Volunteers and Contractors will be required to read and understand the Privacy Policy and sign the following document.



SYDNEY HERITAGE FLEET

Observance of Privacy Policy by Staff, Volunteers and Contractors

Privacy, Confidentiality and Security Agreement.

Sydney Heritage Fleet is committed to ensuring that the organisation complies with relevant privacy, confidentiality and security legislation. To facilitate this, individuals are required to understand their obligations and responsibilities including what it means to sign this agreement.

- **All persons, including staff and volunteers who come into contact with, or have access to, confidential information have a responsibility to maintain the privacy, confidentiality and security of that information.**

Confidential information may include:-

- Information relating to Members, volunteers & staff, including name, address, credit card details, disciplinary actions, health status, staff salaries etc.
 - Corporate information such as financial records, reports, memos, contracts, computer programs, technology budgets, financial reports
 - Third party information such as vendor contracts, computer programs, technology etc.
- Employees and volunteers are to take reasonable steps to destroy or de-identify personal information if it is no longer required for any authorised purpose.
 - Examples of breaches - (What you should not do!) NOTE: These are examples only. They do not include all possible breaches of privacy, confidentiality or security covered by this agreement.
 - Copying and forwarding member, volunteer or staff information to a third party without having verbal or written consent.
 - Sharing your password – except amongst co-workers within your work group
 - Using another person's password without approval :
 - Leaving secure (password protected) information open or unattended whilst logged on but away from your workstation or desk (e.g. on tea or lunch breaks).
 - Leaving hard copy, secure information unattended whilst away from your desk
 - Allowing a co-worker to use a secure system for which he / she does not have access after you have logged in.

Agreement

I..... hereby acknowledge that I have read and understood the Fleet's Privacy Policy as outlined above and the Fleet's detailed Privacy Policy as displayed on the Fleet's website, I agree to adhere to the requirements of both documents and if I become aware of breaches of the Fleet's Privacy Policy by co-workers, members or volunteers I will immediately report such breaches to the General Manager.

Signed _____ Date _____

Witnessed _____ Title _____