

## Checklist: Does the Privacy Policy Adequately describe what is done with personal information?

Issue	Yes/No	Comments
<p><i>Management of personal information</i></p> <p>Does the policy explain how you manage personal information?</p> <p>For example, the policy:</p> <ul style="list-style-type: none"><li>• covers the required topics under APP 1.4</li><li>• covers any other matters necessary in order to adequately describe how you manage personal information (some additional matters are described in the section on Other Matters below).</li></ul>	YES	
<p><i>Relevant?</i></p> <p>Does the policy only include information that is relevant to how you manage personal information?</p> <p>For example, make sure the only terms and conditions that are included relate to privacy.</p>	YES	

<p><i>Easy to understand?</i></p> <p>Is the policy clearly expressed and understandable?</p> <p>For example:</p> <ul style="list-style-type: none"> <li>• a 14 year old would understand it</li> <li>• it does not use <ul style="list-style-type: none"> <li>○ legalistic terminology</li> <li>○ jargon</li> <li>○ acronyms</li> <li>○ in-house terms</li> </ul> </li> <li>• it uses short sentences and text broken up into paragraphs</li> <li>• it meets external readability standards.</li> </ul>	NO	<p>Sometimes the policy uses difficult to understand and commercial jargon, due to it being catered to financial customers.</p>
<p><i>Easy to find?</i></p> <p>Is the policy easy to navigate so that people can find information that is relevant to them?</p> <p>For example, it:</p> <ul style="list-style-type: none"> <li>• has a summary notice that outlines the key points people will want to know about, with links to the full privacy policy (if online)</li> <li>• uses headings to make information easier to find.</li> </ul>	YES	

<p><i>Specific?</i></p> <p>Is the policy tailored to reflect your specific functions, activities and personal information handling practices?</p> <p>For example:</p> <ul style="list-style-type: none"> <li>• it is as specific as possible and does not use words such as ‘may’</li> <li>• it is not simply based on a generalised template used by a different entity</li> <li>• it does not just repeat language in the APPs without providing further details.</li> </ul> <p>If you have distinct organisational areas that handle personal information differently, do you have a set of policies to cover the different personal information handled or the different practices?</p>	<p>NO</p>	<p>The privacy policy contains many ‘may’ clauses, which can be arbitrary and difficult to interpret.</p> <p>Further details is added from the APP, although there are sections that are vague.</p>
<p><i>Tailored?</i></p> <p>Is the policy directed to the specific audiences who may be reading it?</p> <p>For example, if you handle personal information differently for particular classes of people or segments of the community, such as young people, people with a disability, staff or applicants for employment, the policy:</p>	<p>YES</p>	<p>The policy directly addresses the financial customers, who are the audience.</p> <p>Each heading is dedicated to certain audiences. However, some headings may be very generalised and it could be difficult for someone to interpret.</p>

<ul style="list-style-type: none"> <li>• uses headings to separate out information relevant to those particular audiences</li> <li>• uses language appropriate to the target audience</li> <li>• explains the different information handling practices relevant to the particular group.</li> </ul>		
<p><i>Review?</i></p> <p>Has the policy been reviewed recently, to ensure that it reflects your current information handling practices?</p> <p>The policy could include a version number and date.</p>	YES	The privacy policy is dated 26th March 2019

## Privacy Policy Content Checklist

Use this checklist to review a privacy policy contains all of the required parts required by the Australian Privacy Principles.

Issue	Yes/No	Comments
<p><i>The kinds of personal information that you collect and hold.</i></p> <p>For example, the policy:</p> <ul style="list-style-type: none"><li>• gives enough detail about the personal information that is collected and held</li><li>• lists sensitive information separately, and gives more detail about the circumstances in which it is collected and held.</li></ul>	YES	In the section 'What Information do we collect'
<p><i>How you collect personal information.</i></p> <p>For example, the policy describes:</p> <ul style="list-style-type: none"><li>• the personal information that it usually collected directly and by what means (this can be in general terms)</li><li>• the information collected indirectly and by what means (this could be in more detail, as people may not be aware of this collection and holding, for example collection by purchase from list brokers, competitions or referrals).</li></ul>	YES	

<p><i>How you hold personal information.</i></p> <p>For example, in relation to storage, the policy explains, if applicable:</p> <ul style="list-style-type: none"> <li>• if you store personal information with a third party storage provider</li> <li>• if you do or do not combine or link other personal information held about an individual.</li> </ul> <p>For example, in relation to security, the policy explains:</p> <ul style="list-style-type: none"> <li>• your approach to security and risk management</li> <li>• in broad terms, the measures you have in place to manage those risks, such as audit and monitoring of internal staff access to personal information.</li> </ul>	YES	In section “Who do we share your information with”
<p><i>The purposes for which you collect, hold, use and disclose personal information.</i></p> <p>For example, the policy:</p> <ul style="list-style-type: none"> <li>• covers each of these topics for each of your key functions and activities involving personal information</li> <li>• focuses in most detail on the particular uses or disclosures that individuals are most likely to be concerned about or interested in, such as key disclosures to related companies</li> </ul>	YES	

<ul style="list-style-type: none"> <li>• indicates the functions or activities for which you use contractors.</li> </ul> <p>The policy is not expected to describe normal internal operational or business practices such as billing, financial auditing or planning.</p>		
<p><i>How an individual may access their personal information and seek correction of it.</i></p> <p>For example, the policy:</p> <ul style="list-style-type: none"> <li>• states that individuals have a right to request access to personal information you hold about them</li> <li>• states that individuals have a right to request personal information to be corrected</li> <li>• gives contact details for individuals to make such requests which include: <ul style="list-style-type: none"> <li>○ position title of the contact person</li> <li>○ a generic telephone number</li> <li>○ postal address</li> <li>○ a generic email address</li> </ul> </li> <li>• includes information about any procedure that you wish an individual to follow in requesting access or correction (although you can't require the individual to follow that procedure).</li> </ul>	YES	

<p>The policy of an agency could refer to processes for access and correction under the <i>Freedom of Information Act 1982</i>.</p>		
<p><i>How an individual may complain if you or a contractor breaches the APPs or a binding registered APP code.</i></p> <p>For example, the policy:</p> <ul style="list-style-type: none"> <li>• describes the process you use to handle complaints</li> <li>• describes the contact details for making a complaint</li> <li>• indicates that you are bound by a registered APP code, if applicable</li> <li>• outlines the process for complaining to an external complaint body, such as a recognised external dispute resolution scheme, if applicable</li> <li>• describes the different stages in the complaint-handling process: that the complaint must be made directly to you first, that the complaint may then be taken to a recognised external dispute resolution scheme (if applicable), and lastly, that the complaint may be taken to the OAIC.</li> </ul>	<p>YES</p>	



*Whether you are likely to disclose personal information to overseas recipients (including a related body corporate), and the likely countries that information may be sent.*

For example, the policy:

- lists the specific countries you are, or are likely to disclose personal information to (unless it is impractical to specify those countries in the policy)
- where impractical to list countries in the policy:
  - lists countries in an appendix or in another document to which the policy has a link, or
  - lists general regions, for example, the European Union.