



HumanAbility Ltd

Privacy Policy

Last modified: May 2023

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1. Overview

- 1.1. HumanAbility is committed to providing quality services. The Privacy Policy (this Policy) outlines our ongoing obligations in respect of how we manage personal information.
- 1.2. We have adopted the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth) (the Privacy Act). The APPs govern the way in which HumanAbility collect, use, disclose, store, secure and dispose personal information.

2. Personal information collected by HumanAbility

- 2.1. Personal information is information that identifies an individual. Examples of personal information we collect includes names, addresses, email addresses, phone and facsimile numbers.
- 2.2. This personal information is obtained in many ways including [interviews, correspondence, by telephone and facsimile, by email, via our website etc] and from third parties.
- 2.3. HumanAbility collects personal information for the primary purpose of providing our services. We may also use personal information for secondary purposes closely related to the primary purpose, in circumstances where stakeholders would reasonably expect such use or disclosure. Stakeholders may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.
- 2.4. We only collect, hold, use and disclose personal information for a lawful purpose that is reasonably necessary or directly related to one or more of our functions or activities or where otherwise required or authorised by law.
- 2.5. We use and disclose personal information for the primary purposes for which it is collected. We will only use personal information for secondary purposes where we are able to do so in accordance with the *Privacy Act*.

3. Passive Collection

- 3.1. Stakeholders' information - including personal information - is collected by a variety of software applications, services and platforms used by their device and by HumanAbility to support it to deliver services.
- 3.2. This type of information collection is 'passive' as HumanAbility is not collecting this information directly and it does not directly relate to the HumanAbility's provision of services. Stakeholders consent for their information to be collected and shared in this way is typically obtained at the time they first use an application or service on their device.
- 3.3. Stakeholders can opt out of some of these passive data collections, including by:
 - disabling / refusing cookies



- disabling JavaScript
- opting-out of Google Analytics; and
- disabling location services on electronic devices.

4. Sensitive Information

4.1. Sensitive information is defined in the *Privacy Act* to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

4.2. Sensitive information will be used by HumanAbility only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose; and
- With consent; or where required or authorised by law.

5. Third Parties

5.1. Where reasonable and practicable to do so, we will collect personal information from the stakeholder. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that the stakeholder is made aware of the information provided to us by the third party.

6. Disclosure of personal information

6.1. Stakeholder personal information may be disclosed in a number of circumstances, including the following:

- a) Third parties where they consent to the use or disclosure; and
- b) Where required or authorised by law.

7. Security of personal information

7.1. Stakeholder personal information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

7.2. When stakeholder personal information is no longer needed for the purpose for which it was obtained, HumanAbility will take reasonable steps to destroy or permanently de-identify personal information. However, most of the personal information is or will be stored in client files which will be kept by HumanAbility for a minimum of seven (7) years.



8. Access to personal information

- 8.1. Stakeholders may access the personal information we hold about them and to update and/or correct it, subject to certain exceptions. If stakeholders wish to access their personal information, they will contact us in writing.
- 8.2. HumanAbility will not charge any fee for the access request, but may charge an administrative fee for providing a copy of the personal information.
- 8.3. In order to protect stakeholder personal information we may require identification from the stakeholder before releasing the requested information.

9. Maintaining the quality of personal information

- 9.1. It is important to us that personal information is up to date. We will take reasonable steps to make sure that personal information is accurate, complete and up-to-date. If stakeholders find that the information we have is not up to date or is inaccurate, they will advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services.