

PRIVACY POLICY

1 Policy

JCUVet is committed to protecting the privacy of personal information. We will take all reasonable steps to ensure that the collection, use, disclosure and handling of all personal information complies with the Privacy Act 1988 (Cth) [“the Act”] and the Australian Privacy Principles [“APP’s”].

A copy of this policy is available from our website at www.jcuvet.com.au or can be obtained by contacting our Privacy Officer.

2 Scope

This policy applies to all clients, employees, JCU academics, students, visitors, contractors, consultants, suppliers and any other representatives engaged by JCUVet and to those who have a legitimate business need to access personal information in the course of performing their duties.

This policy is therefore an internal and external policy.

3 Responsibility

The obligations imposed on JCUVet under this policy are also imposed on any individual employed or representing JCUVet. If a representative of our organisation discloses personal information to a third party, that individual must take steps as are reasonable in the circumstances to ensure that the third party does not breach the APPs in relation to the information.

All matters concerning information privacy (IP) are to be directed to the attention of our Business Support Manager, who undertakes the role of Privacy Officer:

Privacy Officer:	Business Support Manager
Telephone:	1300 528 838
Email Address:	JCUVetManagement@jcu.edu.au

4 Definitions

Personal Information is defined as information or an opinion about an identified individual, or an individual who is identifiable: whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.

Health information is any information about a person’s health or disability, and any information that relates to a health service they have received, are receiving or will receive. Health information is sensitive and personal, which is why there are laws to protect the rights of individuals in keeping their information private.

Sensitive information is a type of personal information such as: race or ethnic origin, political opinions, religious or philosophical beliefs, sexual preferences and orientation, health information and criminal record. If mishandled, this information may result in discrimination or harm.

5 Collection of Personal Information

Typical examples of personal information collected by JCUVet include:

- Names, address, email address and telephone numbers;
- Student information;
- Financial information such as credit card number and banking information;
- We may capture the IP address and device ID when accessing online services;
- Age, date of birth and gender;
- Employment related information including employment records, training, performance and conduct information, taxation, banking, superannuation details and professional associations;

- Employee, contractor and consultant personal information including addresses, contact numbers, gender, age, employment history, references, resume, medical history, criminal record, emergency contacts, qualifications and licenses;
- Resumes, contact details, references and qualifications for the purpose of assessing suitability for employment; and
- General correspondence and/or notes detailing conversations.

Personal information will be collected directly from the individual whose information it is. However there may be circumstances (e.g. due to health) where we may need to collect information from, or talk to someone else, for example the individual's medical representatives, lawyer, carer or a relative.

In relation to health information, we will only collect health information with the individual's consent to do so. Consent may be express or implied. However, consent may not be required if:

- the collection is required or authorised by an Australian law or court order;
- collection of information is necessary to prevent a serious threat to the life, safety or health; or
- the information is necessary to provide a health service to the individual, and the collection is performed in accordance with the rules of a competent health or medical body (for example, the Medical Board of Australia or the Royal Australian College of General Practitioners).

6 Data Protection

We use a variety of security measures to help prevent unauthorised access to, an improper use of personally identifiable information.

Our employees and other representatives are required to take steps as are reasonable in the circumstances to protect the personal information from misuse, interference, loss and from unauthorised access, modification or disclosure. Our security measures include:

- Making our employees aware of privacy responsibilities;
- Limiting or restricting access to information to those with a legitimate business need;
- Physical security of documents in locked rooms and filing cabinets;
- Appropriate building security and access controls;
- Tracking of any information being shipped or posted;
- Password protection on all electronic and wireless devices;
- Regular and continuous monitoring of our IT systems;
- Installation and maintenance of firewalls to prevent hacker attacks;
- Installation and maintenance of anti-malware programs on computers and servers;
- Limited remote access to our systems by approved users;
- Restriction and secure storage of laptops to those employees who need them;
- Secure access to digital documents held on our printers; and
- Obtaining consent for the use of photographs that identify any individual.

If we hold personal information that we are no longer required by law or industry practice to retain, we will take such steps as are reasonable in the circumstances to destroy the information or to ensure it is de-identified within the timeframes stipulated by any relevant authorities or retention schedules.

Where JCUVet has reasonable grounds to believe that an eligible data breach (as defined in legislation) has occurred, or in instances where it is directed to do so by the Commissioner, it will provide relevant notification to the Office of the Australian Information Commissioner (OAIC) and/or to affected individuals.

7 Use of Personal Information

We use the personal information we collect in connection with our activities and functions, such as:

- Providing veterinary services to animals belonging to clients or others;
- Providing tertiary education, training and mentoring to students;
- Responding to requests and communicating with individuals;
- Processing payments for veterinary services;
- Providing tailored content in publications, email, social media and on the web;
- Performing data analytics to improve our service offerings;
- Payroll, workers compensation, superannuation contributions, and any assessments of fitness for duty for employment purposes;
- Complying with and enforcing applicable legal, industry or government requirements, contractual obligations and our policies and procedures; and
- For any other purpose that we may specifically disclose at the time the information is collected.

We will comply with the requirements in relation to the Spam Act in relation to our commercial communications.

8 Disclosure of Personal Information

There may be occasions where we may need to share personal information with third parties in order to carry out our activities and functions in circumstances such as:

- Third party veterinarians and specialist veterinarians in relation to veterinary services;
- Third party local councils, animal/wildlife rescue organisations or such individuals;
- Third parties providing recruitment, training, human resources, payroll or other services to us;
- Legal, industry or government requirements to share particular statistical information;
- Provision of information to police or subpoenaed information for a court case;
- Certain government agencies (e.g. Australian Tax Office, Centrelink, WorkCover); and
- To our legal, insurance, financial and business advisors and consultants.

We will ensure that any such disclosure is limited to only what is necessary.

All third parties are required to maintain the confidentiality of personal information provided to them by us and are only authorised to use the information for the purpose for which it was collected.

9 Currency of Personal Information

We have an obligation to maintain the currency of personal information held by us, and in connection with the provision of ongoing services or business requirements.

We maintain procedures which may require individuals to update their personal information with us from time to time, and as advised by us.

10 Access to Personal Information

An individual may request to access their own personal information provided to us. In such instance, we will ask for the following:

- Request is to be made in writing to the Privacy Officer
- Personal identity is verified as we require
- Rightful access to the information is established

External persons (e.g. a relative) may only access an individual's personal information in instances where the individual is incapacitated, and where the external person has a legitimate right to access such information. In such instances, we may require evidence of the individual's entitlement to request such information (e.g. provision of the enduring power of attorney).

In accordance with the provisions of APP #12, there are certain circumstances in which JCUVet may refuse to grant an individual access to personal information. In such situations, we will provide the individual with written notice that sets out:

- the reasons for the refusal; and
- the mechanisms available to the individual to make a complaint.

You may update your personal information or opt out from receiving general communications from us by emailing JCUVetManagement@jcu.edu.au

11 Complaints

Individuals have a right to complain about our handling of personal information if the individual believes that JCUVet has breached the Act or APPs.

If an employee or representative of JCUVet becomes aware of an individual wanting to make a complaint to us about a privacy matter, the employee or representative should direct the individual to contact our Privacy Officer. The Privacy Officer will investigate the complaint and will provide a response to the complainant within a reasonable period of time.

Individuals who are dissatisfied with our response to a complaint, may refer the complaint to the Office of the Australian Information Commissioner.

12 Breach of this Policy

An employee, contractor or other representative employed or engaged by us to carry out an act or activity which involves the handling of personal information, is responsible for ensuring that in doing so, they comply with the obligations imposed on JCUVet.

Any breach to this policy may result in disciplinary action up to and including termination of employment or discontinuance of other contractor/supplier agreement.

13 Associated Documents

- Privacy Act 1988 (Cth)
- Australian Privacy Principles
- Information Privacy Act 2009 (Qld)
- Privacy Amendment (Notifiable Data Breaches) Act 2017
- Spam Act 2003 (Cth)