

HGT Australia Limited Privacy Policy



HGT Australia Limited is bound by the Australian Privacy Principles (APP) contained within the Privacy amendment (Enhancing Privacy Protection) Act 2012 and the Privacy Act 1988.

The Act defines 13 Australian Privacy Principles and, from these principles, HGT Australia Ltd is obligated to:

- Only collect information that is necessary for its function and activities.
- Collect personal information by lawful, fair and non-intrusive means.
- Not use or disclose personal information about an individual for a purpose other than the primary purpose of collection.
- Take reasonable steps to ensure that the personal information collected, used or disclosed is accurate, complete and up to date.
- Take reasonable steps to protect the personal information held from unauthorised disclosure, misuse or loss.
- On a reasonable request provide an individual with access to and correction of the information that is held about that individual.
- In the case of a suspected breach of the APP, maintain an effective privacy inquiry and complaints handling system.
- Collect personal or sensitive information about an individual by consent or if the collection of that information is by law.
- Make available information regarding cross border disclosure should personal information of an individual be disclosed to an overseas recipient.

Procedure

Should a client or member of the public believe that HGT Australia Limited has in some way breached its policy with regard to information collected or held the following steps are to be taken.

1. Complainant draws the matter to the attention of the Branch Coordinator of the branch related to the data collection in the first instance in writing or in person.
2. Branch Coordinator informs General Manager of details of the matter (within three working days of receipt of the details).
3. General Manager considers the matter and seeks internal or external counsel as required.
4. General Manager delegates the matter to the divisional manager responsible for the data associated with the matter.
5. Delegated manager takes steps to remedy the matter (within five working days of receipt of the task).
6. Delegated manager reports to General Manager of steps taken (within ten days of receipt of the task).
7. General Manager provides written advice to the complainant of the steps taken to remedy any perceived breach of the HGT Australia Limited Privacy Policy.

Data Breaches

It is mandatory to report any breach of private information held by HGT Australia Ltd within 30 days of any alleged breach occurring. While every precaution is taken to ensure the safety of any personal data there is always still potential for criminal hackers to undermine security protocols.

If an eligible data breach is confirmed, as soon as practicable HGT Australia Ltd must provide a statement to each of the individuals whose data was breached or who are at risk, including details of the breach and recommendations of the steps individuals should take. A copy of the statement must also be provided to the Office of the Australian Information Commissioner (OAIC).

A data breach is eligible if it is likely to result in serious harm to any of the individuals to whom the information relates.

Not all data breaches are eligible. For example, if an entity acts quickly to remediate a data breach, and as a result of this action the data breach is not likely to result in serious harm, there is no requirement to notify any individuals or the Commissioner. There are also exceptions to notifying in certain circumstances.

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