

This policy and related procedures are applicable to the CHL group of companies (CHL) in Australia, including: Community Housing Ltd, Community Housing (Vic) Ltd, Community Housing Investment (VIC) Ltd, Community Housing (Tas) Ltd, Community Housing (Qld) Ltd, Community Housing (WA) Ltd, Community Housing Investment (WA) Ltd, Community Housing (SA) Ltd, Horizon Housing Realty Ltd, Australian Affordable Housing Securities Ltd, Community Housing Investment (QLD) Ltd, Community Housing Investment (NSW) Ltd, Community Housing (NT) Ltd, Community Housing (Subi East) Ltd, Community Housing (Homes For Regions) Ltd, Building Communities Housing Ltd and any other entities within CHL which adopt this policy.

Purpose and scope

This policy defines CHL's commitment to protecting personal information and managing it in a lawful, fair and transparent manner.

This policy outlines how CHL collects, uses, discloses and manages personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

This policy applies to all CHL entities, employees, contractors and systems that handle personal information.

Definitions

Personal information: Information or an opinion about an identified or reasonably identifiable person, whether true or not, and whether recorded or not.

Examples of personal information CHL collects from, or about, an individual includes, but is not limited to:

- contact information (name, address, contact numbers)
- personal details (date of birth, signature, bank account details, government related identifiers)
- social information (household make up, rental history, income details, employment history).

Sensitive information: a higher level of personal information protected under privacy laws. This can include information about a person's health, disability, racial or ethnic background, religious beliefs, criminal history, biometric information or other information that privacy laws treat as sensitive.

Policy statements

1. Principles

1.1. CHL manages personal information in accordance with the following principles:

- **Lawful and fair handling** – Personal information is collected, used and disclosed in a lawful, fair and reasonable manner.
- **Collection and purpose limitation** – Personal information is only collected and used where necessary to deliver services, manage tenancies and meet legal and regulatory obligations.
- **Respect and safeguarding** – Additional care is taken when handling information relating to children and vulnerable persons.
- **Security and confidentiality** – Personal information is protected from misuse, loss and unauthorised access.
- **Transparency and accountability** – Individuals are informed about how their information is handled and can access, correct or raise concerns.

2. Collection and handling

2.1. CHL provides the *Privacy Collection Notice* at or before the time of collection, where practicable, to inform individuals how their personal information will be collected, used, disclosed and managed.

2.2. CHL collects and manages personal information in a manner that is lawful, fair and reasonable. This includes:

- collecting information only where reasonably necessary to deliver housing services, manage tenancies, meet legal and regulatory obligations, or support organisational functions
- considering the nature of the information and potential impact on the individual

- collecting directly from individuals where practicable, with reasonable steps taken to notify individuals where information is collected indirectly
- providing clear information at the time of collection, including:
 - the purpose of collection
 - how the information will be used and disclosed
 - any legal requirements to collect the information
 - the consequences of not providing the information
- only collecting sensitive information where it is reasonably necessary and:
 - the individual has provided consent; or
 - collection is otherwise permitted or required by law
- applying additional safeguards where personal information relates to children or vulnerable persons, including:
 - appropriate consent and authority arrangements
 - consideration of the individual's capacity and circumstances
 - alignment with CHL's *Children and Vulnerable Persons Safety (Safeguarding) Policy*.

2.3. Personal information may also be collected from government agencies, support providers, referral partners, legal representatives or other authorised third parties where permitted by law.

2.4. CHL may collect limited technical and usage information through its websites and digital services, such as IP addresses, browser information and usage data, to support website functionality, security, analytics, system performance and service improvements. This may occur through the use of cookies or similar technologies.

2.5. Individuals may adjust browser settings to not accept cookies, however some website features may not operate correctly as a result.

3. Use and disclosure

3.1. Personal information is used and disclosed for primary purposes related to CHL's functions and service delivery. This includes:

- assessing eligibility for housing and services
- managing tenancies and property-related services
- coordinating services with government agencies and support providers
- meeting contractual, legal and regulatory obligations
- managing complaints, incidents, investigations and legal matters.

3.2. Personal information collected by one CHL entity may be shared with related CHL entities where this is connected to the purpose for which the information was collected, reasonably expected by the individual, consented to, or otherwise permitted or required by law.

3.3. CHL will only use or disclose personal information for secondary purposes where permitted by law, including where:

- the individual has consented
- the use or disclosure is reasonably expected and related to the primary purpose
- the use or disclosure is required or authorised by law.

3.4. Use and disclosure of personal information is limited to what is reasonably necessary for the relevant purpose

3.5. CHL may disclose personal information, where reasonably necessary or permitted by law, to:

- employees and related CHL entities

- government agencies and regulators
 - support providers, contractors and service partners
 - financial institutions, legal representatives or debt recovery agencies.
- 3.6. CHL will not adopt, use or disclose government related identifiers except where required, authorised or permitted by law.
- 3.7. CHL will take reasonable steps to ensure overseas service providers and recipients manage personal information in accordance with Australian privacy obligations or equivalent privacy protections.
- 3.8. CHL does not use or disclose personal information for direct marketing unless permitted by law. CHL will obtain consent before using or disclosing sensitive information for direct marketing purposes.
- 3.9. Where lawful and practicable, individuals may interact with CHL anonymously or using a pseudonym. However, this may not be possible where identification is required to deliver housing, support services, comply with legal obligations or verify eligibility.

4. Data Quality, Security and Retention

- 4.1. CHL maintains appropriate controls to ensure personal information is accurate, secure and appropriately managed. This includes:
- taking reasonable steps to ensure information is accurate, complete, up to date and relevant
 - implementing security measures to protect information from misuse, loss, unauthorised access, modification or disclosure, including access controls and permissions, secure systems and storage environments and employee training and awareness.
 - retaining information only for as long as required to meet operational, legal and regulatory requirements
 - securely destroying or de-identifying personal information when no longer required and where permitted by law, in accordance with CHL's *Records Management Policy* and legal retention obligations.

5. Data breaches and governance

- 5.1. CHL maintains processes and oversight to manage privacy risks and incidents in line with the *Technology Incident Response Policy* and *Data Breach Notification Procedure*. This includes:
- identifying, assessing and responding to suspected or actual data breaches promptly
 - managing data breaches in accordance with the Notifiable Data Breaches (NDB) scheme
 - maintaining governance arrangements, including oversight by a designated Privacy Officer, defined roles and responsibilities, monitoring and continuous improvement
 - embedding privacy considerations into system design, process development and service delivery
 - ensuring employees and contractors understand and comply with privacy obligations
 - considering privacy and information handling impacts when implementing new technologies, digital platforms, artificial intelligence tools, automated decision-making processes or systems involving personal information.
- 5.2. Where CHL handles personal information on behalf of a government agency, complying with contractual or legislative obligations relating to privacy incidents, including notification, reporting and cooperation requirements.

6. Access, Correction and Contact

- 6.1. Individuals may request access to, or correction of, personal information CHL holds about them and may raise concerns about how their information is managed.
- 6.2. CHL will:

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- take reasonable steps to verify an individual's identity before releasing personal information
 - provide access to personal information within a reasonable timeframe, subject to legal limitations and permitted exceptions under privacy law
 - take reasonable steps to correct personal information that is inaccurate, incomplete, out of date, irrelevant or misleading
 - respond to access, correction and privacy complaints in a fair, consistent and timely manner
 - provide written reasons where access or correction is refused, unless unreasonable to do so
 - inform individuals of available complaint or review pathways, including the Office of the Australian Information Commissioner (OAIC).
- 6.3. CHL may refuse access or correction requests where permitted by law, including where access may:
- pose a serious threat to the life, health or safety of a person
 - unreasonably impact the privacy of another person
 - prejudice investigations, legal proceedings or regulatory activities
 - be otherwise required or authorised to be refused by law.
- 6.4. CHL will not charge individuals for requesting correction of personal information. Reasonable administrative charges may apply for access requests where permitted by law.
- 6.5. For general enquires about this Privacy Policy, requesting access to personal information or making a privacy complaint, contact: privacy@chl.org.au.

7. Complaints process

- 7.1. Privacy complaints are to be managed and investigated by the Privacy Officer.
- 7.2. Written complaints can be emailed to privacy@chl.org.au or posted to:
- The Privacy Officer
Community Housing Limited
Level 15, 222 Exhibition Street
Melbourne, Vic, 3000
- 7.3. When making a complaint, the individual is asked to provide their contact details, sufficient background information and details of how they are impacted by the event.
- 7.4. All complaints will be acknowledged within 5 business days of receipt.
- 7.5. The Privacy Officer will investigate the event and complaint. This may include requesting more information, gathering documents, conducting interviews and obtaining legal advice. Where practicable, the Privacy Officer will provide the individual with a written outcome of their investigation.
- 7.6. Should the individual wish to report a complaint or feels that CHL has not addressed the concern in a satisfactory manner, they may wish to contact the Office of the Australian Information Commissioner (OAIC). For more information or to obtain a copy of the Australian Privacy Principles (APP) visit <https://www.oaic.gov.au>.

Accountability

Chief Governance Officer – accountable for authorising submission to the Executive Team for final policy endorsement by the Chief Executive Officer.

Privacy Officer – responsible for reviewing and maintaining the policy, overseeing its effective implementation and providing advice.

All Employees – responsible for complying with the policy, actively supporting its implementation, and contributing to the achievement of its objectives. Failure to adhere to this policy may result in disciplinary action, up to and including termination of employment.

Related documents

- Children and Vulnerable Persons Safety (Safeguarding) Policy
- Code of Conduct Policy
- Feedback, Complaints and Appeals Policy
- Records Management Policy
- Technology Incident Response Policy
- Data Breach Notification Procedure
- Privacy Collection Notice

Legislation

- Australian Privacy Principles Guidelines
- Privacy Act 1988
- Privacy Amendment (Enhancing Privacy Protection) Act 2012
- National Regulatory Community Housing Standards
- State Privacy Acts and Regulations

Approved by

Approved by **Alicia Follent, Acting Chief Executive Officer on 21/05/2026.**