# PRIVACY POLICY

## 1. PURPOSE

East Gippsland Water (EGW) is committed to protecting the privacy of personal information, especially in relation to our customers and our staff. We are obliged to comply with the privacy principles set out in the *Privacy and Data Protection Act 2014* (Vic), the *Health Records Act 2001* (Vic), certain provisions in the *Privacy Act 1988* (Cth) and related legislation, standards and directives. This policy outlines how EGW collects, uses and protects personal information in accordance with our obligations. It also outlines how individuals can access information and how a complaint can be made should there be a suspected privacy breach.

## 2. DEFINITIONS

**Personal Information** means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

If the information enables an individual to be identified, contacted or located, this constitutes a breach of privacy. Examples of private information that could be accessed, include, amongst others: photographs, telephone numbers, email addresses, online accounts, residential or work addresses, and places of education and worship.

**Personal Privacy** means privacy of personal information.

**Sensitive Information** covers:

- Information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, that is also personal information; or
- Health information about an individual.

## 3. COLLECTION OF PERSONAL INFORMATION

### 3.1 Types of Information Collected

EGW will only collect information that is necessary to provide our customers with water and sewerage services. The types of personal information collected and held includes, but is not limited to, the following:

- Names and addresses (including previous addresses)
- Dates of birth
- Email addresses
- Telephone numbers
- Bank details
- Real estate agents (if dealing with a tenant customer).

Sensitive and health information if it is necessary to deliver our services and only with the consent of the impacted individual.

Health information is also collected for both employment and safety reasons. Our health information handling procedures adhere to the Victorian Health Privacy Principles.

### 3.2 Anonymity

Where practicable, provision will be made for allowing individuals to remain anonymous in their dealings with EGW, however service delivery may be impaired should we not receive the necessary information to complete a request.

### 3.3 Third Party Collection

Wherever possible, we collect information directly from individuals. In the event that information is collected from a third party, the impacted individual will be advised as soon as possible.

### 3.4 Website Collection

When you visit our website, we may collect certain information about your internet traffic, including but not limited to:

- IP Address: This is used to identify your device and provide location-based services.
- Browser Type and Version: This helps us ensure compatibility and optimize your browsing experience.
- Pages Visited: We track the pages you visit to understand your interests and improve our content.
- Time and Date of Visit: This helps us analyse traffic patterns and manage server loads.
- Referring Website: If you arrived at our site via a link from another website, we may be able to collect information about that referring website.

## 4. USAGE OF PERSONAL INFORMATION

EGW uses the information collected to provide customers with the services they request. We also collect personal information from our staff for their employment. If personal information is used for other purposes, such as marketing and press releases, consent will be sought.

### 4.1 Website Collection Usage

In relation to Website collection, the information we collect is used for the following purposes:

- Improving User Experience: By understanding how you interact with our website, we can make improvements to enhance your experience.

- Security: Monitoring internet traffic helps us detect and prevent fraudulent activities and security breaches.
- Analytics: We use aggregated data to analyse trends and gather demographic information for internal use.

We do not sell, trade, or otherwise transfer your personal information to outside parties. By using our website, you consent to our privacy policy.

### 4.2 Information Shared with Third Parties

Information may need to be shared with third parties. This can occur in circumstances where we are obliged to do so by law. Contractors engaged may also be supplied with information, however EGW ensures that they comply with privacy obligations as prescribed in procurement and employment processes.

## 5. PROTECTING PERSONAL INFORMATION

EGW will take all reasonable steps to protect information held from unauthorised access, use and disclosure. EGW is committed to implementing the Victorian Data Security Framework to safeguard customer and staff information from loss or exploitation. Information security measures are also continuously improved.

### 5.1 Disposal

Any information that is no longer required, subject to retention requirements, will be securely disposed of as soon as possible.

### 5.2 Family Violence

We have a family violence policy that outlines our approach to supporting customers and staff who experience family violence. Protection of data in these circumstances is considered to be paramount.

### 5.3 Internet Information Caution

Encryption (encoding software) is not used to protect information sent from computers over the Internet. Customers are cautioned to be aware of the risks associated with using our internet site for the exchange of personal information.

## 6. ACCESSING PERSONAL INFORMATION

Members of the public can access personal information held by EGW by completing an Access to Personal Information form, which can be obtained from the Privacy team on 1800 671 841 or by visiting the Bairnsdale Office at 133 Macleod Street, Bairnsdale VIC 3875. Individuals can only gain access to their own personal information.

Access to appropriate and relevant information will be provided within 30 days of receipt of a request.

Staff can only gain access to their own personal information through internal processes.

### 6.1 Correction of Accessed Information

Any information that is deemed inaccurate will be subsequently amended within 5 days of receipt of a written request to amend it. Should a request of this nature be refused, reasons for refusal will be provided to the party requesting the amendment.

## 7. PRIVACY BREACHES

If it is discovered that privacy has been breached, the breach will be referred to the EGW Privacy Team who will assess the breach and follow directives from the Privacy Commissioner in accordance with the *Privacy and Data Protection Act 2014* (Vic).

Impacted parties will be contacted and kept informed in relation to the progress of the breach response and any corrective actions undertaken.

## 8. PRIVACY COMPLAINTS

Members of the public and staff are advised that if they have any concerns relating to the handling of personal information they can contact our Privacy Team by telephone 1800 671 841 or by visiting the Bairnsdale Office at 133 Macleod Street, Bairnsdale VIC 3875. Should staff not satisfy the concerns raised, a formal complaint can be raised using the privacy complaint form:
F025 Privacy Complaint Form

Complaints or concerns regarding the handling of personal information will be fully investigated and actioned appropriately.

Independent advisors or the Office of the Victoria privacy Commissioner (Office of the Victorian Information Commissioner – Freedom of Information | Privacy | Data Protection) can be contacted for guidance on alternative courses of action that may be taken.

## 9. RELATED POLICIES & STANDARD OPERATING PROCEDURES (SOP)

- Privacy (SOP 088)
- Protective Data Security Policy (POL 065)
- Protective Data Security (SOP 179)

## 10. REFERENCES

- *Privacy and Data Protection Act 2014* (Vic)
- *Privacy Act 1988* (Cth)
- *Health Records Act 2001* (Vic)

## 11. REVIEW

This policy is authorised by the Board. The policy will be reviewed three yearly unless circumstances warrant an update within that time. It was last reviewed and approved on 15 April 2025.

## 12. VERSION HISTORY

| Version No. | Date of Adoption |
|---|---|
| 1 | 21/05/2003 |
| 2 | 16/05/2020 |
| 3 | 15/04/2025 |

## 13. SPONSOR

Managing Director.