

# BCG PRIVACY POLICY EXPIRES 03 JUNE 2024

# BCG Privacy Policy

# **C**ONTENTS

| Purpose  | 3 |
|--|---|
| Objectives   | 3 |
| Scope  | 3 |
| Definitions  | 3 |
| What is Personal Information and why do we collect it? | 3 |
| What is Sensitive Information                          | 4 |
| Obtaining Consent                                      | 4 |
| Third Parties  | 5 |
| Members  | 5 |
| People who Attend a BCG Event                          | 5 |
| Disclosure of Personal Information                     | 5 |
| Security of Personal Information                       | 5 |
| Cloud Storage  | 6 |
| Physical Storage                                       | 6 |
| Access to your Personal Information                    | 6 |
| Maintaining the Quality of your Personal Information   | 6 |
| Failure to Comply                                      | 6 |
| Ownership of Policy                                    | 6 |
| Applicable Legislation                                 | 7 |
| Revision of Policy                                     | 7 |
| Privacy Policy Complaints and Enquiries                | 7 |

# **PURPOSE**

The purpose of this policy is for the Birchip Cropping Group (BCG) to be transparent and respectful in relation to the management and the handling of personal information belonging to all individuals who provide such information to us.

BCG is committed to protecting the personal information that we collect, use and disclose to others.

This policy ensures that BCG can collect the personal and business information necessary to operate its services and functions, while recognising the right of individuals to have their information handled in ways that they would reasonably expect. We adhere to the thirteen Australian Privacy Principles set out in the Privacy Act 1988. A copy of the Principles can be obtained from the website of the Office of the Australian Information Commissioner at www.aoic.gov.au.

# **OBJECTIVES**

The Board and Management of BCG will:

- Embed a culture of privacy within the organisation that enables compliance.
- Establish a robust and effective privacy process.
- Regularly evaluate our privacy processes to ensure continued effectiveness.
- Provide a robust response to any privacy issues that are raised.

# **SCOPE**

This policy applies to all BCG employees, Board members and volunteers, or any other person that may have access to BCG data deemed to be subject to the Privacy Act 1988, (cth) or the Privacy and Data Protection Act 2014 (Vic).

#### **DEFINITIONS**

| Term                          | Definition  |
|-------------------------------|---|
| Personal Information          | Personal information is information or an opinion about an identified individual, or an individual who is 'reasonably identifiable'. This may take the form of verbal, written or photographic information. |
| Australian Privacy Principles | The thirteen principles of a right to privacy that are outlined in the Privacy Act 1988 (cth).  |
| De-identified information     | Information that does not identify and cannot be traced back to the person to whom it belongs.  |

# What is Personal Information and why do we collect it?

Personal information is information or an opinion that identifies an individual. Examples of Personal Information we collect includes:

- Names
- Addresses
- Email addresses
- Phone numbers

Farm size

This personal information is obtained in many ways, including but not limited to:

- Interviews
- Membership applications and renewals
- Correspondence
- Sensor feeds (personal and shared)
- Telephone
- Research
- Email
- Our website (<u>www.bcg.org.au</u>)
- Research partners
- Other publicly available sources

## Personal information does not include:

- Anonymous information.
- Aggregated information (such as data that reflects trends without identifying the sample).
- De-identified information.
- Information about companies or other entities which does not identify individuals.

We collect your Personal Information for the primary purpose of providing our services to you, for use in research projects, to add to a database of contacts for future extension activities and for other purposes related to our core work.

We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing, or by using the electronic unsubscribe option at the bottom of such communications.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

## WHAT IS SENSITIVE INFORMATION

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. BCG will not ask you for such data.

- Sensitive information will be used by us only:
- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

#### **OBTAINING CONSENT**

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

## THIRD PARTIES

Where reasonable and practicable to do so, we will collect your personal information only from you. However, in some circumstances we may be provided with information by third parties. In such cases we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

#### **M**EMBERS

BCG members provide personal information to BCG to enable us to provide member services to them. Such information includes:

- Name
- Contact details

BCG may disclose member details to preferred partners for the purposes of direct marketing campaigns, however members are offered the option to opt out on both the membership application form and the annual renewal form.

From time to time BCG may conduct member surveys. This information is aggregated, and all personal information removed. Answers may be provided anonymously.

As a leading agricultural research organisation, BCG hosts many students and other agricultural groups. From time to time we are asked for the details of farmers that may be able to assist with other research projects. We will always ask your permission before we disclose your details to a third party.

#### PEOPLE WHO ATTEND A BCG EVENT

If you attend a BCG run event, you may be photographed. Such photographs may be used for promotional purposes. You may also be asked to provide your contact details. These details may be used to invite you to further BCG events, or to invite you to become a BCG member. Your data will be stored either on the BCG server or in the BCG cloud.

# DISCLOSURE OF PERSONAL INFORMATION

Your personal information may be disclosed in the following circumstances:

- To third parties where you consent to the use or disclosure.
- Where required or authorised by law.

BCG will not disclose your personal information to third parties that are not located within Australia.

#### SECURITY OF PERSONAL INFORMATION

Your personal information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure. We store documents both locally and in a protected cloud environment.

If we are made aware of a breach of information we will notify you as required by the Privacy Amendment (Notifiable Data Breaches) Act 2017.

#### **BCG Privacy Policy**

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

#### **CLOUD STORAGE**

BCG will use a reputable cloud storage facility. Information will be stored within an Australian data centre and be subject to Australian privacy laws.

#### PHYSICAL STORAGE

The BCG server is contained within a firewall and regular security patches are applied. The server password is a minimum of eight characters and contains at least three of the four following categories:

- Upper case letter
- Lower case letter
- Number
- Special characteristic

Back-ups of data are stored offsite. All devices that backups are stored on are automatically locked and an alarm raised if there are five unsuccessful login attempts made within two minutes.

# **Access to your Personal Information**

You may access the personal information we hold about you to update and/or correct it. Please contact us in writing should you wish to do this.

BCG will not charge any fee for your access request but may charge an administrative fee for the time taken to provide a copy of your personal information.

To protect your personal information, BCG will require that you provide identification before actioning such requests.

# Maintaining the Quality of your Personal Information

It is an important to us that your personal information is up to date. We will take reasonable steps to make sure that your personal information is accurate, complete and up-to-date. If you find that this is not the case, please advise us as soon as possible so that we can update our records and continue to provide quality services to you.

#### **FAILURE TO COMPLY**

Deliberate, ongoing, reckless or serious breaches of this policy by BCG employees will be dealt with by disciplinary action, up to and including dismissal.

#### OWNERSHIP OF POLICY

The BCG CEO is the owner of this policy.

# **APPLICABLE LEGISLATION**

Privacy Act 1988

Privacy Amendment (Notifiable Data Breaches) Act 2017

Telecommunications Act 1997

Privacy Data and Protection Act 2014 (Vic)

# **REVISION OF POLICY**

This policy is valid from 03 June 2019 and will be reviewed every five years or after changes to any relevant legislation.

# PRIVACY POLICY COMPLAINTS AND ENQUIRIES

BCG's Privacy Manager is the Senior Manager for Engagement Corporate and Business Services.

If you have any queries or complaints about our Privacy Policy, please contact us at:

Birchip Cropping Group Email: info@bcg.org.au PO Box 85 Phone: (03) 5492 2787

Birchip Victoria 3483