



Infrastructure and Project Financing Agency (IPFA)

Operational Guidelines

Privacy Policy

Document History

Version	Date	Approval
1	March 2018	Chief Executive Officer
1.1 (reflecting position title changes only, and template update)	March 2019	Director, Corporate, Finance and People
2	November 2019	Chief Executive Officer



1. Introduction

1.1. About this Privacy Policy

The *Privacy Act 1988* (Privacy Act) requires entities bound by the Australian Privacy Principles to have a Privacy Policy. This Privacy Policy outlines the personal information handling practices of the Infrastructure and Project Financing Agency (IPFA) and is published on our website www.ipfa.gov.au.

This policy is written in simple language. The specific legal obligations of IPFA when collecting and handling your personal information are outlined in the Privacy Act and in particular in the Australian Privacy Principles (APPs) found in that Act. IPFA will update this Privacy Policy when our information handling practices change.

1.2. Privacy Act

In general terms, the Privacy Act regulates how personal information about an individual is collected and handled. 'Personal information' is information or an opinion about an identified individual or an individual who is reasonably identifiable:

- a. whether the information or opinion is true or not, or
- b. whether the information or opinion is recorded in a material form or not.

Personal information includes information such as:

- a. your name or address.
- b. bank account details and credit card information.
- c. photos.
- d. internet clickstream.
- e. cookies data.
- f. information about your opinions.

The thirteen APPs in Schedule 1 of the Privacy Act regulate how agencies (including IPFA) can:

- a. collect.
- b. use.
- c. disclose.
- d. Store.
- e. access
your personal information.

1.3. Who should read this Privacy Policy?

This Privacy Policy is particularly relevant to you if you are:

- a. an individual whose personal information may be given to or held by IPFA.
- b. a contractor, consultant, supplier or vendor of goods or services to IPFA.



- c. a person seeking employment, or employed with IPFA.



1.4. IPFA and anonymity

Where possible, we will allow you to interact with us anonymously or using a pseudonym. However, for most of our functions and activities we usually need your name and contact information and enough information about the particular matter to enable us to fairly and efficiently handle your matter.





2. Personal Information Handling Practices

2.1. Collection of personal information

Personal information about you may be collected by IPFA from you, from your agent or from a third party. IPFA uses forms, online portals, electronic and paper correspondence as well as telephone and fax to collect this information.

Broadly grouped, the personal information we collect and hold may include:

- a. documents relating to employment with IPFA (e.g. personnel, email and telephone records).
- b. distribution and mailing lists.
- c. contact lists.
- d. internet clickstream and cookies data.
- e. comments on IPFA social networking services.
- f. information relating to work health and safety assessments, incidents and investigations.
- g. financial and other information about tenderers, contractors and customers.

The APPs provide that IPFA may only collect information for a lawful purpose that is directly related to a function or activity of IPFA and when the collection is necessary for, or directly related to, that purpose. For example, IPFA collects personal information to enable us to:

- a. manage employees.
- b. manage suppliers and contractors.
- c. contact you.

2.2. Types of personal information that IPFA holds

Personal information we collect and hold may include:

- a. name, address and contact details (eg phone, email and fax).
- b. date of birth.
- c. gender.
- d. curriculum vitae.
- e. qualifications and referee reports
- f. signature.
- g. driver's licence and passport information.

2.3. Sensitive information

We may also collect or hold a range of sensitive information about you, including your:

- a. racial or ethnic origin.
- b. criminal record.
- c. financial arrangements (eg bank account information).
- d. medical history.



- e. information relevant to a work health and safety assessment, incident or investigation.

If you or another person provides IPFA with sensitive information, IPFA will only retain the information if:

- a. you have consented to the collection of the information and it is reasonably necessary for, or directly related to, one of IPFA's functions or activities.
- b. collection of the information is required or authorised by or under an Australian law or a court/tribunal order.
- c. collection of the information is authorised for other purposes permitted under the Privacy Act – this includes where IPFA suspects that unlawful activity, or serious misconduct, relating to IPFA's functions and activities has been, is being or may be engaged in.

If the sensitive information does not fall within one of these categories, IPFA will not keep a record of the information and instead we will arrange for its return or secure destruction if it is lawful and reasonable to do so.

2.4. Privacy notice

At or before the time we collect your personal information (or as soon as practicable afterwards), we may provide you with a notice (also known as 'Privacy Notice' or 'Australian Privacy Principle (APP) Notice') containing the following information:

- a. the purpose for which the information is collected.
- b. if the collection is required or authorised by law.
- c. any person or body to whom we usually disclose the information.

IPFA provides this notification on online portals and application forms.

2.5. Use and disclosure of personal information

IPFA may use and disclose collected information, including personal information, for the primary purpose for which it was collected, including to:

- a. respond to correspondence.
- b. provide secretariat services.
- c. maintain contact with stakeholders, and other Government agencies.
- d. analyse IPFA website access and downloads.
- e. perform IPFA's other functions.

IPFA may also use or disclose your personal information for a secondary purpose where an exception applies. Exceptions include:

- a. an individual has consented to a secondary use or disclosure.
- b. an individual would reasonably expect the secondary use or disclosure, and that is related to the primary purpose of collection or, in the case of sensitive information, directly related to the primary purpose.
- c. the secondary use or disclosure of the personal information is required or authorised by or under an Australian law or a court/tribunal order.
- d. a permitted general situation exists in relation to the secondary use or disclosure of the personal information.



- e. IPFA reasonably believes that the secondary use or disclosure is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

2.6. Unsolicited personal information

From time to time, we receive personal information that is additional to information that we have solicited or information that we have not taken active steps to collect. This is known as 'unsolicited personal information' and could potentially include, but not be limited to:

- a. misdirected mail received by us.
- b. correspondence to us, our Ministers and Parliamentary Secretary from members of the community, or other unsolicited correspondence.
- c. a petition sent to us that contains names and addresses.
- d. employment, internship, work experience or volunteering applications sent to us on an individual's own initiative and not in response to an advertised vacancy.
- e. a promotional flyer or email containing personal information, sent to us by an individual promoting the individual's business or services.
- f. court documents for proceedings to which we are a party or may have an interest.

If we receive unsolicited personal information and we decide that we are not permitted to collect it in accordance with the APPs, we will take reasonable steps to destroy or de-identify the information as soon as practicable, unless it is contained in a 'Commonwealth record' or it is unlawful or unreasonable to do so.

2.7. Access to and correction of personal information

IPFA takes steps to ensure that the personal information we collect is accurate, up to date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed, and at other times as necessary.

Under the Privacy Act you have the right to ask for access to personal information that we hold about, and ask that we correct that personal information. You can ask for access or correction by contacting IPFA and we must respond within 30 days. If you ask, we must give you access to your personal information, and take responsible steps to correct it if we consider it is incorrect, unless there is a law that allows or requires us not to.

2.8. Storage and security

IPFA has controls in place to protect the information we collect from loss, unauthorised access or disclosure and from any other misuse. Our controls include:

- a. access to personal information collected is restricted to authorised persons within IPFA.
- b. our internal network and databases are protected using firewall, intrusion detection and other technologies.
- c. paper files containing personal and sensitive information are protected in accordance with Australian Government security policy and secured in locked



cabinets, Australian Government-approved security containers or secure rooms with restricted access.

- d. IPFA's premises are under 24-hour surveillance and access is via security passes only, with all access and attempted access logged electronically.
- e. IPFA's host agency provider of ICT equipment and services conducts system audits and staff training to ensure adherence to our established their protective and computer security practices.

2.9. Cookies, Google Analytics, and Clickstream data

When you visit the IPFA website, we use a range of tools provided by third parties such as Google to collect or view website traffic information. These websites have their own privacy policies. We also use cookies and session tools to improve your experience when accessing our website. Information collected when you visit the IPFA website may include the IP address of the device you are using and information about sites that IP address has come from. IPFA uses this information to maintain, secure and improve our website. In relation to Google Analytics, you can opt out of the collection of this information using the Google Analytics Opt-out Browser Add-on.

2.10. Social Networking Services

IPFA may use social networking services such as LinkedIn, Twitter, Facebook, and YouTube to communicate to the public and potential employees. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These sites have their own privacy policies.



3. Complaints

3.1. How to make a complaint

If you wish to make a complaint to us about how we have handled your personal information you should complain in writing. If we receive a complaint from you about how we have handled your personal information we will determine what (if any) action we should take to resolve the complaint.

We will tell you promptly that we have received your complaint and then respond to the complaint within 30 days.

You can contact us by:

Post: The Privacy Contact Officer
Infrastructure and Project Financing Agency
PO Box 6500
BARTON ACT 2600

Telephone: +61 2 62715357

Email : ipfa@ipfa.gov.au

3.2. How to make a complaint to the Office of the Australian Information Commissioner

If you are dissatisfied with the way IPFA handles your privacy-related complaint you may contact the Office of the Australian Information Commissioner (OAIC) by:

Post: Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: <https://www.oaic.gov.au/>



4. Complaints

Contact IPFA if you want to:

- a. obtain access to your personal information.
- b. request a correction to your personal information.
- c. make a complaint about a breach of your privacy.
- d. query how your personal information is collected, used or disclosed.
- e. make a suggestion or comment in relation to our Privacy Policy.
- f. ask questions about our Privacy Policy.

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