# **Privacy Policy**

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## 1. Purpose

This policy sets out the principles by which the History Trust of South Australia (HTSA) collects, uses, maintains and protects personal information. Application of this policy ensures HTSA's compliance with the South Australian Government's <u>Information Privacy Principles</u>.

## 2. Scope

This policy, from the date of endorsement, applies to all employees, Trustees, contracted service providers, volunteers and other individuals involved in HTSA operations at all sites including field work locations and offsite delivery of programs.

#### 3. Context

Premier and Cabinet Circular *PC012 – Information Privacy Principles (IPPS) Instruction* provides the basis for this policy.

## 4. Policy Detail

In the South Australian public sector, personal information is protected by the <u>Information Privacy Principles</u>, which establish how personal information must be managed. This Privacy Policy is complemented by HTSA's Privacy Statement, which is displayed on all HTSA websites.

#### 4.1 What is Personal Information?

Personal information is any information that can be linked to an identifiable living person. This could include a document, an identifying number, a photograph or video. It could include information detailing the person's name, address, date of birth, financial or health status, ethnicity, gender, religion, alleged behaviour, licensing details, or a combination of such details. The important question to ask in determining whether information is personal information is whether it can identify a particular individual (1).

#### 4.2 Purpose

HTSA respects personal privacy and is committed to protecting the personal information it collects. HTSA collects personal information for the following purposes:

- Carry out transactions, such as processing payments and donations
- Interact with persons or provide information about activities, events and programs that may be of interest
- Maintain memberships, subscriptions or communications preferences
- Assess eligibility to access HTSA programs
- Maintain our business records
- Assess and manage grants
- Seek donations or sponsorship

<sup>&</sup>lt;sup>1</sup> Privacy Guidelines for South Australian Government Websites and Online Applications, April 2014 Version 1.2





- Any purpose required or permitted by law
- Any purpose that a person would otherwise reasonably expect.

#### 4.3 Collection

HTSA only collects personal information by lawful and fair means. Collection of personal information may occur:

- through interactions via telephone, mail and email
- when a person enters information on a HTSA website, app, social media account or other digital platform
- face-to-face, when attending a HTSA museum, event or other activity.

HTSA will endeavour to advise the purpose for, and handling of, personal information prior to collection. Where this is not practicable, such advice will be provided as soon as practicable after collection.

HTSA will only collect the personal information that is required and relevant to conduct its operations. HTSA will take reasonable steps to ensure personal information collected is accurate, upto-date and complete.

Financial transactions are processed by external financial institutions. The History Trust does not collect or store credit card or account details.

#### 4.4 Third-party Applications

HTSA provides some services and visitor engagement via third-party products such as event bookings, online surveys, payment service providers and social media. Any personal information collected for these services is strictly used for the provision of the service or engagement. Personal information is only gathered or stored elsewhere with prior agreement of the individual.

#### 4.5 Use /Disclosure

Personal information is retained and used for the purposes subscribed to.

HTSA employees who have access to personal information are bound under this Policy, and the <u>Code</u> <u>of Ethics for the South Australian Public Sector</u>, regarding the access, use and disclosure of personal information.

HTSA will not sell or rent any personal information to third parties. HTSA may share personal information with third parties, but only for a purpose that is required or permitted by law, or for which the individual has provided consent. Such third parties may include:

- service providers, including IT services, financial institutions, mailing houses etc
- venues, for the purpose of facilitating attendance at events
- grant peer assessment panels
- professional advisers, including lawyers, accountants and auditors
- government, regulatory and law enforcement authorities
- the individual's agents or representatives.

### 4.6 Storage/Security

Keeping personal information secure is important to HTSA. HTSA takes all reasonable steps to ensure that personal information it holds is protected from misuse, interference and loss caused by unauthorised access, modification or disclosure.





Personal information may be held in both paper-based and electronic files. Electronic information is stored on secure servers with access restricted as per 4.5.

## 4.7 Access and Correction

Individual's seeking to gain access to and/or correct their personal information held by HTSA can send a request to <a href="mailto:team@history.sa.gov.au">team@history.sa.gov.au</a>. Requests to access personal information will be handled in accordance with the <a href="mailto:Freedom of Information Act (1991">Freedom of Information Act (1991)</a>. All requests will be responded to and incorrect, incomplete or out-of-date personal information will be corrected.

# 5. Key Roles/Responsibilities

All HTSA Trustees and employees are responsible for ensuring compliance with this Policy.

## 6. Reporting

Any complaints regarding the collection or use of personal information will be reported as per HTSA's Complaints Policy.

## 7. Related Documents

Premier and Cabinet Circular PC012 - Information Privacy Principles

HTSA Privacy Statement (on website)

Code of Ethics for the South Australian Public Sector

Freedom of Information Act (1991)

# 8. Glossary of Terms

Term	explanation	
Consent	This can either be expressed or implied. Expressed consent may be written or verbal. An example of expressed consent is opting in to receive email marketing from HTSA via our website. Implied consent is where HTSA can reasonably form the view that a person has given consent by taking a certain action. An example of implied consent is that by emailing the HTSA contact inbox a question, a person has implied that they consent to us contacting them in relation to their enquiry, using the contact information provided.	
Personal information	Information or an opinion (whether true or not) relating to a natural person, or the affairs of a natural person, whose identity is apparent, or can be reasonably ascertained, from the information or opinion.	



