

Privacy Policy

1. Purpose and scope

- 1.1 Greater Western Water Corporation ABN 70 066 902 467 (GWW) is a water corporation established under the *Water Act 1989* (Vic). GWW provides water services to customers within the GWW service area, including water supply, sewage and trade waste disposal and treatment.
- 1.2 GWW and its employees respect the privacy of all customers and other individuals. The purpose of this Privacy Policy (Policy) is to set out GWW's commitments regarding privacy in handling your personal and health information.
- 1.3 The Information Privacy Principles under the *Privacy and Data Protection Act 2014* (Vic) (**PDP Act**) apply to GWW in handling your personal information, and the *Health Records Act 2001* (Vic) (**HR Act**) applies to GWW when handling your health information.
- 1.4 This Policy also applies to all GWW directors, executives, employees, 'in house' contractors and consultants and any individuals or groups undertaking activity for or on behalf of GWW. All references in this Policy to 'we', 'us' and 'our' are to GWW.

2. Collection of personal information

- 2.1 We collect personal information that is necessary for us to perform our functions under the *Water Act 1989* (Vic), including for the purpose of providing water and sewerage related services and products, promoting such services and products, and market research.
- 2.2 The types of personal information that may be collected and held by us for these purposes include the following:
 - 2.2.1 identifying details (eg your name, date of birth, driver licence details, pension card number, concession card details);
 - 2.2.2 contact details (eg your current and previous addresses, email address, telephone numbers);
 - 2.2.3 information when you lodge an enquiry or provide feedback to help us improve our services;
 - 2.2.4 health or special needs information collected under the HR Act for ensuring continuous water supply and for the purposes of applying payment concessions;
 - 2.2.5 information on personal circumstances (eg domestic violence);

- 2.2.6 information on prior dealings with us;
 - 2.2.7 information about employment (eg place of work, position, authority to transact);
 - 2.2.8 statistical information regarding the use of GWW websites (eg domains from which website users visit, IP addresses, the dates and times of visits);
 - 2.2.9 water usage recorded by water meters (whether digital or otherwise);
 - 2.2.10 job application information when an individual applies for a job with GWW; and
 - 2.2.11 personal information for employment purposes.
- 2.3 Generally, we try to collect personal information directly from you, however there are certain situations in which we may collect personal information about you from someone else, such as your real estate agent, landlord, solicitor, conveyancer or other authorised agent or representative.

3. Use and disclosure of personal information

- 3.1 GWW will generally use and disclose your personal information for purposes related to the purpose for which the information was collected, or where you have consented to the use or disclosure.
- 3.2 We may provide personal information about you to our service providers who assist us in providing our services, such as data processing, bill production, research, mail services and water and sewer system maintenance and repair. We will disclose your personal information only to those third party service providers on a confidential basis so that the service provider can effectively provide those services to you. We may also disclose your personal information to statutory agencies, local government or the Victorian Government upon request to facilitate their compliance with their statutory obligations and laws.
- 3.3 We will store, use and disclose personal information to conduct or improve our business activities and may provide personal information to contractors or third parties (including account collection and credit reporting agencies) for these purposes.
- 3.4 We may otherwise use or disclose your personal information where required or authorised by law, which may include emergency situations and assisting law enforcement agencies, as permitted under the PDP Act.

- 3.5 Apart from the above, the personal information we collect will not be used or disclosed for any other purpose without your consent unless permitted under the PDP Act or other privacy laws.

4. Website collection and cookies

- 4.1 When you use our website we may collect personal information about you depending on how you use the website. We may request your name, address and credit card details for specific transactions to enable us to provide services to you.
- 4.2 GWW also collects and stores anonymous information about visitors to the website through its web server, eg number, date and time of visits to our website. This information is collected for statistical purposes to help us improve our service. This information is not personal information because it does not identify individuals.
- 4.3 GWW uses 'cookies' on its website to provide information and services to website visitors. Cookies are small applications that a website transfers to your computer's hard disk for record keeping purposes and are a necessary part of facilitating online transactions. Most internet browsers are set to accept cookies. Cookies are useful to estimate the number of visitors and determine overall traffic patterns through our websites. If you do not wish to receive any cookies you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of the services on our website.
- 4.4 When you access our website you will be deemed to have agreed to comply with GWW's Online Privacy Statement (see [here](#)).

5. Accessing and correcting your personal information

- 5.1 If you need to access or correct any personal information GWW holds about you, please contact us using the Contact Details set out at section 13 below. We request that you provide us with as much detail as you can about the particular information you seek in order to help us retrieve it. An access fee may be charged to cover our costs of providing that information to you.
- 5.2 In certain circumstances, we may not be required by law to provide you with access to, or to correct, your personal information. If that is the case, we will give you our reasons for our decision.

6. Data quality and data security

- 6.1 GWW takes reasonable steps to make sure that the personal information we collect, use and disclose is accurate, complete and up to date.

- 6.2 We will update and correct our records when you advise us that your personal information has changed. If you tell us that the personal information we hold about you is not accurate, complete or up to date we will correct that information.
- 6.3 GWW takes reasonable steps in accordance with the Victorian Protective Data Security Standards to protect all of the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure. This includes imposing confidentiality requirements on employees and contractors, and having in place document storage security, policies, systems and site access restrictions.
- 6.4 GWW will take reasonable steps to destroy or permanently de-identify your personal information in accordance with the *Public Records Act 1973* (Vic) and any other relevant laws if it is no longer needed for any purpose.
- 6.5 This protection applies in relation to information stored in both electronic and hard copy form.

7. Openness

- 7.1 GWW will make available to you information relating to our privacy policies and related processes, including:
- 7.1.1 access to this Policy:
- (a) on our website (<https://www.gww.com.au/>); or
 - (b) in hard copy by contacting GWW's Legal Counsel – Governance, FOI and Privacy (see contact details in section 13 below).
- 7.1.2 access to other privacy related information, including:
- (a) an Online Privacy Statement, available on our website, which relates specifically to the collection and use of your personal information by electronic means (see [here](#) for further information);
 - (b) recorded messages on our Interactive Voice Response (telephone answering) system; and
 - (c) privacy-related advice on our various application forms, Customer Charters and customer accounts.

8. Anonymity

- 8.1 Wherever it is lawful and practicable, customers have the option of not identifying themselves when entering into transactions with GWW.
- 8.2 In some cases however, if you do not provide us with your personal information when requested, we may not be able to provide you with the product or service that you are seeking. For example, you must identify yourself to receive water and sewerage related services and products or to enable repairs or maintenance to the water and sewerage infrastructure connected to your property.

9. Freedom of information

When an application is made for documents under the *Freedom of Information Act 1982 (Vic)* (**FOI Act**), GWW will use the exemption provision at section 33 of the FOI Act to withhold disclosure of documents where such disclosure would entail unreasonable disclosure of information relating to the personal affairs of any person, when that person is not the applicant.

10. Unique identifiers

- 10.1 We will not assign unique identifiers unless necessary to enable us to carry out our functions efficiently. We will not adopt a unique identifier that has been assigned by another organisation (eg your tax file number) or use or disclose a unique identifier assigned to you by another organisation unless the privacy law requirements have been met.
- 10.2 We will not require you to provide a unique identifier unless the unique identifier is required or authorised by law or is in connection with the purpose for which the unique identifier was assigned.

11. Transborder data flows

We may transfer personal information to someone who is outside Victoria only if we reasonably believe the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the Information Privacy Principles, if you consent to the transfer or otherwise in accordance with the PDP Act.

12. Sensitive information

- 12.1 Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection. We only collect sensitive

information where it is reasonably necessary for our functions or activities and either:

12.1.1 the individual has consented; or

12.1.2 we are required or authorised by law (including applicable privacy laws) to do so.

12.2 Sensitive information includes 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, or criminal record.

13. Contact details

13.1 If you have any questions or feedback about privacy, wish to access your personal information, or to make a complaint about the way in which we have handled your personal information, please contact us by:

Mail:

Legal Counsel – Governance, FOI and Privacy
Greater Western Water
Locked Bag 350
Sunshine VICTORIA 3020

Telephone: 13 4499

Email: privacy@gww.com.au

13.2 If you have a privacy complaint please let us know as soon as possible so we can act quickly to resolve the issue. We will investigate the complaint, answer questions and do all we can to address the concerns of the complainant. Any complaints regarding privacy matters will be managed by GWW's Legal Counsel – Governance, FOI and Privacy.

13.3 You may also complain to the Office of the Victorian Information Commissioner (**OVIC**) about an act or practice by us that involves personal information about you that you believe is in breach of one of the Information Privacy Principles. See [here](#) for further information.

14. Roles and responsibilities

All GWW employees are responsible for complying with relevant GWW policies, guidelines and processes related to this Policy.

15. Changes to this Policy

We may change this Policy at any time. The current version will be posted on our website and a copy may be obtained by contacting our Legal Counsel – Governance, FOI and Privacy (see contact details above at section 13). This Policy will be reviewed every two years or more frequently as required.

16. References

PDP Act including the Information Privacy Principles and any applicable Code of Practice under that Act;

FOI Act; and

HR Act including the Health Privacy Principles under that Act.

Approved by Board on 27 June 2023
Next due for review by the Board in June 2025

Version control table

| Version Number | Author Title | Purpose/Change | Date |
|----------------|---------------------------------------|---|------------|
| V7-0 | General Counsel | This Privacy Policy has been updated in accordance with the Victorian Privacy and Data Protection Act 2014 as approved by the Board. | 25/02/2020 |
| V8-0 | General Counsel & Corporate Secretary | This Privacy Policy has been updated in accordance with the Victorian Privacy and Data Protection Act 2014 and as a result of the integration between City West Water Corporation and Western Region Water Corporation. | 22/06/2021 |
| V9-0 | General Counsel & Corporate Secretary | Minor refinements following biennial review. | 27/06/2023 |