

# PRIVACY POLICY

Humanitex Pty Ltd

## 1. PURPOSE

1.1 The purpose of this Privacy Policy is to ensure Humanitex Pty Ltd ("Humanitex") manages personal information in accordance with:

- a) Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs);
- b) Information Privacy Act 2009 (Qld) and the Queensland Privacy Principles (QPPs); and
- c) Any other applicable laws and contractual obligations.

1.2 This policy defines the legal obligations and information management practices required to maintain confidentiality, integrity, and security of personal information held by Humanitex.

1.3 This policy is published on our website and is available in alternative formats upon request to ensure transparency and accessibility.

## 2. SCOPE AND APPLICATION

2.1 This policy applies to:

- a) All Humanitex employees, directors, officers, contractors, and agents;
- b) All activities involving the collection, use, disclosure, storage, or handling of personal information;
- c) All information systems and records used by Humanitex; and
- d) All forms of personal information, whether electronic or physical.

## 3. DEFINITIONS

3.1 For the purposes of this policy:

- a) Personal Information means information or opinion about an identified individual or an individual who is reasonably identifiable;
- b) Sensitive Information includes health information, racial or ethnic origin, political opinions, religious beliefs, sexual orientation, or criminal record;
- c) Health Information means information about an individual's health, disability, or health services provided;
- d) Data Breach means unauthorised access, disclosure, loss, or alteration of personal information.
- e) Unsolicited Information means personal information received without being actively collected by Humanitex.

## 4. LEGAL OBLIGATIONS

4.1 Humanitex complies with:

- a) APPs under the Privacy Act 1988 (Cth);
- b) QPPs under the Information Privacy Act 2009 (Qld);
- c) Mandatory data breach notification requirements under both Acts;

- d) Mandatory data breach notification requirements under the Notifiable Data Breaches (NDB) scheme and Queensland IP Act reforms; and
- e) Contractual obligations with government and private sector clients.

## 5. COLLECTION OF PERSONAL INFORMATION

5.1 Humanitex will only collect personal information:

- a) Where necessary for its functions or activities;
- b) In a lawful and fair manner; and
- c) With the knowledge and, where applicable, consent of the individual.

5.2 Humanitex will offer individuals the option of anonymity or pseudonymity where lawful and practicable.

5.3 Humanitex will take reasonable steps to inform individuals at or before collection of:

- a) The purpose of collection;
- b) The identity of Humanitex and contact details;
- c) Any law requiring collection; and
- d) Any third parties to whom the information may be disclosed;
- e) How individuals can access this Privacy Policy and lodge complaints; and
- f) Whether information will be disclosed overseas and safeguards in place.

5.4 If Humanitex receives unsolicited personal information, it will determine whether it could have lawfully collected the information. If not, the information will be destroyed or de-identified as soon as practicable.

## 6. USE AND DISCLOSURE

6.1 Humanitex will only use or disclose personal information:

- a) For the primary purpose of collection;
- b) For a related secondary purpose reasonably expected by the individual;
- c) With consent; or
- d) As required or authorised by law.

6.2 Direct marketing will only occur in compliance with APP 7, including providing opt-out mechanisms.

6.3 Cross-border disclosure will only occur where:

- a) Equivalent privacy protections apply;
- b) The individual has given informed consent; or
- c) The transfer is authorised by law.

Humanitex will take reasonable steps to ensure overseas recipients do not breach APPs or QPPs.

## 7. DATA SECURITY

7.1 Humanitex will take reasonable steps to protect personal information from:

- a) Misuse, interference, and loss; and
- b) Unauthorised access, modification, or disclosure.

7.2 Security measures include:

- a) Role-based access controls;
- b) Encryption and secure systems;
- c) Physical security for paper records; and
- d) Secure disposal protocols.

7.3 Humanitex will retain personal information only for as long as necessary to fulfil its legal and business obligations, after which it will securely destroy or de-identify the information.

## **8. INFORMATION QUALITY**

8.1 Humanitex will take reasonable steps to ensure personal information is accurate, complete, and up-to-date.

## **9. ACCESS AND CORRECTION**

9.1 Individuals may request access to or correction of their personal information by contacting the Privacy Officer.

9.2 Requests must be made in writing and will be processed within 30 days, subject to legal exemptions.

9.3 If a request is refused, Humanitex will provide written reasons and information on how to lodge a complaint.

## **10. DATA BREACH MANAGEMENT**

10.1 Humanitex maintains a Data Breach Response Plan.

10.2 In the event of a breach, Humanitex will:

- a) Contain and assess the breach;
- b) Notify affected individuals and relevant authorities; and
- c) Implement corrective actions.

10.3 Humanitex will comply with mandatory reporting obligations under the NDB scheme and Queensland IP Act by notifying OAIC and/or the Qld Information Commissioner where required.

## **11. PRIVACY IMPACT ASSESSMENTS (PIAS)**

11.1 Humanitex will conduct PIAs for projects involving:

- a) New or increased collection, use, or disclosure of personal information;
- b) New technologies or platforms; or
- c) Material privacy or security risks.

## **12. ROLES AND RESPONSIBILITIES**

12.1 The Director is responsible for approving and overseeing this policy.

12.2 The Director acts as the Privacy Officer and is responsible for:

- a) Managing privacy compliance and complaints;
- b) Assessing PIAs; and
- c) Coordinating breach responses.

12.3 All personnel must comply with this policy and report privacy risks immediately.

### 13. COMPLAINTS AND ENQUIRIES

#### 13.1 Contact:

Director of Humanitex Pty Ltd

Email: [claire@humanitex.com.au](mailto:claire@humanitex.com.au)

Postal Address: 1786/17 Gould Road Herston 4006

Phone: +61 422 998 092

#### 13.2 If unresolved, individuals may contact:

a) Office of the Australian Information Commissioner (OAIC): [www.oaic.gov.au](http://www.oaic.gov.au)

b) Office of the Information Commissioner Queensland: [www.oic.qld.gov.au](http://www.oic.qld.gov.au)

13.3 Humanitex will acknowledge complaints within 7 days and aim to resolve them within 30 days. If more time is required, the individual will be informed in writing.

### 14. REVIEW AND AMENDMENTS

#### 14.1 This policy will be reviewed:

- a) Annually;
- b) Following legislative changes; or
- c) After significant privacy incidents.

#### 14.2 Amendments must be approved by the Director and documented in version control.