

Privacy Policy

Overview

SGCH Homes Victoria and its subsidiaries (**we, our and us**) respect the privacy of customers and other people we engage with in the course of our activities.

Our principal obligations as to how we handle personal information arise under the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**). Our handling of health information in Victoria is governed by the Health Privacy Principles (**HPPs**) in the *Health Records Act 2001* (Vic). We may also have contractual or legislative obligations under Victorian state-based privacy laws, such as where we are a contracted service provider to the State of Victoria.

This privacy policy outlines how we handle personal information and how to contact us if you have any queries or complaints.

Definitions

Personal Information

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not and whether the information or opinion is recorded in material form or not.

Typical examples of personal information include a person's name, address, telephone number, bank account details or credit card information.

Sensitive Information

Sensitive information is a special category of personal information. It includes information or opinion about an individual's racial or ethnic origin, political opinion, membership of a political association, professional or trade association or trade union, religious or philosophical beliefs, sexual orientation or practices, criminal record, health information, some genetic information, and some aspects of biometric information.

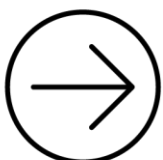
Health Information

Health information includes information or opinion about a person's physical, mental or psychological health, or their disability, information about a health service provided to them and genetic information about them that could predict their health of that or their descendants. Examples include reports and assessments from health practitioners or the nature of health, disability or aged care services that have been, or are to be, provided to an individual.

Types of information we collect and hold

We collect and hold a range of personal information in carrying out our functions or activities as a community housing provider. The types of personal information we collect and hold about you will depend upon the nature of our relationship with you and the circumstances of a collection, including whether we collect the information from you as a customer, supplier, contractor, job applicant or some other capacity.

For example:



1800 573 370
office@sgch.com.au
PO BOX 888
Liverpool NSW 1871
sgch.com.au

Level 4, 50 Scott Street, Cabrogal Country, Liverpool NSW 2170 (Registered office)

SGCH Homes
Victoria Limited
ABN 15 674 979 821
ACN 674 979 821



- if you are a customer in Victoria, we collect and hold your name, postal, residential and email address, gender, date of birth, nationality, language/s spoken, Centrelink Customer Reference Number (CRN), education and qualifications, bank account details, proof of identity (such as your driver's licence), photographs or images, health or medical reports and emergency contact details
- if you deal with us in some other capacity, we may collect your name and contact details and any other information you choose to provide to us.
- we may also collect details of the interactions you have with us.

If you provide us with personal information about another person, please make sure that you tell them about this privacy policy.

If you are or become an employee, the handling of your personal information may be exempt from the APPs if it is directly related to your current or former employment relationship with us.

Personal information we are required to collect

If you apply for housing with us, we may be required under legislation or policy to collect certain personal information to support your application. If we are unable to collect this information from you, we will not be able to progress your application.

How we collect personal information

We collect personal information in a variety of ways, including:

- when you provide it to us (such as when you interact with us in writing, electronically or by telephone, or in person)
- when you visit our website
- from third parties such as Government agencies, support or health service providers
- when you use an IT device we provide
- from social media (such as LinkedIn and Facebook)
- information that we generate ourselves, such as records we make of calls or meetings we have with you

Where possible, we will collect information about a person from the person. However, there may be times we receive personal information about a person from third parties or publicly available sources or through other agencies that we deal with.

Where it is practicable and legal, we will let people remain anonymous or use a pseudonym (a name that is not their legal name) to communicate with us, for example, if you contact us to ask a general question. However, we will usually need your name and contact information to be able to respond to questions and requests.

We collect security camera footage at our workplaces and some of our properties for the security and safety of our team members, tenants, and visitors to our locations. We may also use and disclose this footage to comply with our legal and regulatory obligations and as otherwise authorised by law.



The purposes for which we collect, use, hold and disclose personal information

We collect, hold, use and disclose personal information for a range of purposes including:

- to provide our services (including communicating with customers about our services, processing applications for housing and managing tenancies);
- to verify your identity and eligibility for community housing;
- to undertake service delivery reporting;
- to respond to your enquiries about our services;
- to process payments made to us;
- for our administrative purposes and internal record keeping;
- to provide you with customer service or technical support and deal with any complaints or feedback you have;
- to perform research and analysis and improve or develop our services;
- to manage our relationships with our customers, suppliers and contractors;
- to consider job applicants for current and future employment; and
- to respond to inquiries from government departments in connection with the services we provide.

We may use and disclose your personal information for other purposes required or authorised by or under law (including purposes for which you have provided your consent).

Disclosure of personal information to third parties

In conducting our business, we may disclose your personal information to third parties for the purposes outlined above, if permitted or required by law, or with your consent. These third parties may include, where appropriate:

- our related entities (including St George Community Housing Limited and its subsidiaries);
- State Government and relevant agencies;
- financial institutions for payment processing;
- our contracted service providers, including;
 - delivery and shipping providers
 - IT service providers
 - marketing, promotional and market research agencies; and
 - external business advisers (such as auditors and lawyers); and
- in the case of a sale of our business (in whole or in part) to the purchaser (as an asset of the business); and
- if you are a job applicant, referees whose details you provide to us.



We may also disclose your personal information to other third parties and for other purposes where we are required or authorised by or under law to do so (including where you have provided your consent).

How we store and secure personal information

We store personal information in both hard copy and electronic form. We will take all reasonable steps to make sure that personal information we hold is stored securely and is protected from misuse, interference or loss and unauthorised access, modification or disclosure. This includes taking appropriate security measures to protect electronic materials.

As a general rule, we will not disclose personal information to any recipients outside Australia. However, some personal information we hold electronically might be stored overseas using cloud computing or other electronic storage services.

If we hold personal information about an individual and we don't need the information anymore or we aren't legally required or authorised to keep the information, we will take all reasonable steps to destroy or de-identify the information.

Access to and correction of personal information

You have a right to request access to personal information that we hold about you and request its correction if it is inaccurate, out of date, incomplete, irrelevant or misleading.

You are welcome to request that we provide access to the personal Information we hold about you by contacting us using the details listed at the end of this Policy. Generally, we will provide access to the information in the manner requested (subject to some exceptions permitted by law). We will not unreasonably refuse requests to access personal information and we will respond to requests for access within a reasonable time.

Where we agree to provide access to personal information, in some circumstances we may charge an access fee to cover our reasonable costs of retrieving the information and supplying it to you. No fee will be incurred for requesting access, but if a request for access is accepted, you will be notified of the fee payable (if any) for providing access.

You may also request correction of personal information we hold about you if they believe it is inaccurate, incomplete, irrelevant, misleading or out of date. There is no fee for doing this. To do so, please contact us at the contact details listed at the end of this Policy.

Privacy and our website

Web analytics

We use Google Analytics to collect data about the way people use our website (including your IP address, the region or location indicated by your IP address, type of browser you use, date and time of your visit to our website, and pages accessed). We use the information collected to help to improve our website. Google Analytics is hosted overseas.

Cookies

We might use 'cookies' to collect data to help us to manage our website and improve our online services. 'Cookies' are small files placed on your computer when you visit a website. 'Cookies' capture how often you visit pages and other data about browsing preferences. 'Cookies' are not used to identify people but can help us to provide a more personalised online experience. Users can configure their browsers to manage, accept or reject cookies.



The information collected about your visit to our website using cookies is not personal information, because we cannot identify you from it. For example, we may record the IP address accessing our website, the date and time of your visit, the pages you viewed, the page you came from to get to our site, any documents you downloaded and the type of browser and operating system you used. If collected, this information will be used and disclosed by us in anonymous, aggregated form only, for purposes including statistical analysis and website development.

Embedded videos

We use YouTube to host embedded videos on our website. When a video is played from our website, YouTube collects information about activity such as videos watched and interaction with content and advertisements. We use this information to improve our website and its content. YouTube is hosted overseas.

Third party sites and platforms

We are not responsible for any acts or practices that take place on third party platforms and/or websites that might breach privacy, therefore we recommend that individuals always examine the terms and conditions and privacy policy of the relevant platform and/or website.

Applications and feedback

We collect information from people when they apply for one of our products or services, when they report maintenance, or when they provide feedback such as an appeal, complaint, or compliment. We use the information we collect to respond to maintenance reports and feedback and to assess applications for products and services. We use Jotform and Gravity Forms to collect this information. Jotform is hosted overseas, and Gravity Forms is hosted in Australia.

Social media

We use social media platforms to communicate with people about the work we do. We may collect personal information from people when they communicate with us using these platforms. The social media platform may also collect personal information of users for its own purposes. Social media platforms have their own privacy policies which are available on their websites.

Direct marketing

We may use personal information from time to time to send marketing communications. For example, if you are a current or prospective customer, or you sign up to a mailing list or register for events or updates.

We may contact you by email, mail, SMS or telephone.

We use Campaign Monitor to manage mailing lists and registrations. Campaign Monitor collects data about which emails are opened and which links are clicked. Campaign Monitor stores data in a US-based data centre and uses data processing locations in the US, Australia and Germany.

If you wish to cease receiving marketing communications from us, please contact us directly on the contact details listed at the end of this Policy asking to be removed from our mailing lists or use the "unsubscribe" or "update your preferences" facilities included in all our marketing communications.



Recruitment

We will handle all personal information of job applicants in accordance with the APPs. If we are sent an application to be considered for an advertised position (or unsolicited), the personal information contained in the application may be used to assess suitability for employment with us. This personal information may be disclosed to our related bodies corporate and/or service providers for human resources management activities. As part of the application process, individuals may be asked for consent to the disclosure of personal information to those people nominated to provide references. We may also obtain information from other sources such as criminal history checks or working with children checks. A refusal to provide any of this information, or to consent to its proposed disclosure, may affect our ability to assess your application.

If you become an employee, the handling of your personal information may be exempt from the APPs if it is directly related to your current or former employment relationship with us.

Resolving privacy issues and further information

We are committed to working with people to resolve any issues or concerns about privacy.

Any questions or complaints relating to the way we handle your personal information, or requests to access or correct personal information we hold about you, should be directed to our Privacy Officer.

Contacting our Privacy Officer

Phone: 1800 573 370

Email: privacy.officer@sgch.com.au

Mail: Privacy Officer

PO Box 888

Liverpool NSW 1871

If you contact us with a privacy complaint, we will inquire into your complaint and respond within a reasonable period of time (not later than 30 days). If we do not resolve your privacy complaint to your satisfaction, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) if it relates to personal information at oaic.gov.au or by post to GPO Box 5288, Sydney NSW 2001.

If the complaint relates to our handling of health information in Victoria, you can lodge a complaint with the Health Complaints Commissioner:

Phone: 1300 582 113

Office/Post: Level 26, 570 Bourke Street, Melbourne, 3000

Website: <https://hcc.vic.gov.au/>

Recording conversations/meetings with us

When customers contact us at the Customer Care Hub, they will be advised that that initial call may be recorded for training and service improvement purposes.



We do not allow customers to record conversations and meetings with us. However, if requested, we may provide a written statement of agreed actions following a meeting or conversation.

Changes to our privacy policy

From time to time it may be necessary for us to review and revise our Privacy Policy. We may notify you about changes to this Privacy Policy by posting an updated version on our website. We encourage you to check our website from time to time to ensure you are familiar with our latest Privacy Policy.

Our Privacy Policy was last updated on 18 March 2025.

Relevant legislation, regulations or standards

- [Privacy and Data Protection Act 2014 \(Vic\)](#)
- [Health Records Act 2001 \(Vic\)](#)
- [Privacy Act 1988 \(Cth\)](#)
- [Australian Privacy Principles](#)
- [Housing Act 1983 \(Vic\)](#)
- [Surveillance Devices Act 1999 \(Vic\)](#)

Related documents/resources

- [Policy: Appeals, complaints and feedback](#)

Policy information

Version:	1
Approved:	18 March 2025
Reviewed:	Not applicable
Review frequency:	24 months
Responsible team/position:	Privacy Officer
Transparency & Accessibility:	Available on our website