

Privacy Policy

This page outlines how Cubic Real Estate Pty Ltd T/A Cubic Housing (referred to as the Company) collects, uses, stores and discloses Personal Information in accordance with the Australian Privacy Principles 2014 (APPs) under the Privacy Act 1988 (Cth) (Act).

You can also view our Privacy Policy in PDF form by clicking [here](#).

1. Purpose

This policy outlines how the Company collects, uses, stores and discloses Personal Information in accordance with the Australian Privacy Principles 2014 (APPs) under the Privacy Act 1988 (Cth) (Act).

2. In and out of scope

This Policy applies to all individuals which the Company will be collecting Personal Information from.

Individuals include, but are not limited to, Cubic Housing Clients, Directors, Employees and Employment Candidates.

3. Policy statement

The Company is committed to respecting and protecting the privacy and rights of individuals.

3.1 Personal Information

When used in this Privacy Policy, the term "Personal Information" has the meaning given to it in the Act. Basically, Personal Information is any information held by an entity that can be used on its own or in combination with other information held by the same entity, to personally identify an individual. This can include an individual's:

Name

Address

Email address

Contact number

Age or date of birth

Gender

Ethnicity

Country of origin
Religious belief
Employment history
Income details
Proof of identity
Photographs
Profession, occupation or job title
Work experience
Educational qualifications
Centrelink information
Credit information and other financial records
Next of kin
Public trustee details
Bank statements
Criminal history
Tax File Number / Returns
Tenant ledgers
Personal Information includes Sensitive Information (see section 4.7 of this Policy).

The Company may also collect information that is not Personal Information because it does not identify a particular individual. For example, Cubic Housing may collect anonymous answers / feedback to surveys or aggregated information about how users use the Cubic Housing website.

3.2 Collecting Personal Information

The Company collects Personal Information directly from the individual unless it is unreasonable or impracticable to do so, as well as through third parties. Cubic Housing can collect Personal Information in the following ways:

Written forms

Face-to-face

Over the phone or other messaging technology

Via the internet, including email or Cubic Housing's website

Hardcopy documents provided by individuals

Via a third party, e.g. government entities, law enforcement agencies, social workers, medical practitioners, previous landlords, personal referees, tenancy databases, recruitment agencies, etc.

3.3 Purpose of Collecting Personal Information

The Company collects Personal Information to perform business activities and deliver services. The Company will not collect information unless it is for a proper and lawful purpose.

In most situations, individuals will be advised as to why Cubic Housing is collecting Personal Information and who else might receive this information. Cubic Housing may decide not to provide this advice to individuals if Cubic Housing is not legally required to provide the advice.

The purposes for collecting Personal Information from each category of individuals may include:

Individuals	Purposes
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All Cubic Housing Clients	
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to provide suitable housing arrangements through assessing applications and allocating appropriate properties etc.
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to provide tenancy related services including repairs and maintenance to properties

to provide other related services through assessing applications, case planning and management etc.

for communication purposes

to facilitate community engagement

to engage in direct marketing

to seek feedback and improve on services
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to comply with reporting requirements to government agencies, regulators etc.

to provide information to support partners and
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health providers who participate in information sharing

Employment Candidates, Volunteers and Students	
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to assess suitability for employment or to undertake other roles within or for Evolve Housing

Employees, Contractors and Directors	
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for identification

for human resource purposes including payroll

for conflict of interest purposes

for regulatory, governance and related purposes

If an individual does not provide Cubic Housing with Personal Information when prompted, Cubic Housing may be unable to contact the individual or provide any services to the individual. In the case of employment candidates, Cubic Housing will not be able to consider applications for employment.

3.4 Unsolicited Personal Information

In the event Cubic Housing receives unsolicited Personal Information, the Company will determine whether it could have been lawful for the Personal Information to be collected if it had been solicited. If it isn't, Cubic Housing will destroy the information or ensure that the information is de-identified as soon as practicable and only if it is lawful and reasonable to do so.

3.5 Disclosure of Personal Information

Cubic Housing may disclose Personal Information for a purpose for which it was collected (as listed in 4.3) eg to arrange maintenance contractors for your residence.

Cubic Housing will only disclose Personal Information for another purpose:

If the disclosure is directly related to the purpose for which the information was collected and there is no reason to believe that the person concerned would object

If the person to whom the information relates was informed when the information was collected that it might be disclosed in this way;

If it is reasonably believed that the disclosure is necessary to prevent or lessen a serious and imminent threat to any person's health, safety or life

Where the person to whom the information relates to has provided informed consent

If a permitted general situation exists in relation to the use or disclosure of the information

If lawfully authorised or required to do so under the Privacy Act by legislation, or a Privacy Code of Practice, or Cubic Housing's Privacy Policy, and if available, supported by a Service Agreement or similar document.

3.5.1 Record of Understanding

Cubic Housing and the NSW Police may also exchange information through a Record of Understanding to:

Maintain law and order in and around Cubic Housing properties

Develop and implement crime prevention and community safety strategies.

A deed of confidentiality is signed by the officers accessing the information and the signed deed placed on the tenant file.

Cubic Housing will also provide information to police when subpoenaed, unless the information is not in the public interest – in these cases, Cubic Housing may lodge an appeal not to provide the information.

3.5.2 Providing information to a third party

Where information is being disclosed to a third party, Cubic Housing ensures that the third party is also bound by the Privacy Act and has an obligation to keep Personal Information confidential and to take reasonable steps to keep the Personal Information secure from misuse, interference, loss, unauthorised access, modification or disclosure.

3.6 Storage of Personal Information

Cubic Housing is committed to protecting Personal Information and takes reasonable steps to ensure Personal Information is protected from misuse, interference, loss, and unauthorised access, modification or disclosure. Some of the security measures include:

Physical, electronic, and procedural safeguards in line with industry standards (such as passwords and physical locks on cabinets)

Secure server and closed network environments

Limited access to Personal Information (e.g. only relevant employees who require an individual's Personal Information to carry out his / her normal line of duties are allowed access)

Management of access privileges, and regular review of the privileges

- Destroying or de-identifying Personal Information pursuant to the law and record retention policies

3.7 Sensitive Information

'Sensitive information' is a subset of Personal Information. In short, it is Information about an individual's:

racial or ethnic origin

political opinions or membership of a political association

religious beliefs or affiliations, or philosophical beliefs

membership of a professional or trade association or trade union

sexual orientation or practices, or

criminal record

It also includes an individual's health information, genetic information, and biometric information.

Cubic Housing recognises that Sensitive Information is generally afforded a higher level of privacy protection under the APPs than other Personal Information. The Company recognises that inappropriate handling of sensitive information can have adverse consequences for an individual or those associated with the individual, including discrimination, mistreatment, humiliation, embarrassment or the undermining of an individual's dignity.

Cubic Housing may collect Sensitive Information about an individual, but only where the individual has provided consent and where the information is relevant to the services provided by Evolve Housing.

3.8 Access and Correction of Information

Individuals have the right to request access to the Personal Information Cubic Housing holds about them, and request correction of any inaccurate, out-of-date, incomplete, irrelevant or misleading Personal Information. It is the individual's responsibility to inform Cubic Housing of any corrections or changes to Personal Information. Individuals who would like to request access to, or correction of, their Personal Information held by Cubic Housing, must contact Cubic Housing using the details provided in Section 3.10 below.

There may be instances where a request to access could be refused if it falls under a category outlined in APP12, however on these occasions Evolve Housing will inform the individual in writing of the reason for the refusal and any avenues to make a complaint about that decision.

3.9 Complaints

If an individual is concerned that Cubic Housing has not complied with applicable privacy laws, the individual may raise a complaint through Cubic Housing's complaints process. The process is as follows:

Step 1: Let Cubic Housing know

The individual should contact our Privacy Officer using the details provided in Section 4.10 below. We will acknowledge the complaint within 2 working days.

Step 2: Investigation of Complaint

The complaint will be investigated by our Privacy Officer. A response to the complaint will be provided in writing within 20 working days.

Step 3: It is expected that Cubic Housing's procedures will deal fairly and promptly with a complaint. However, if the individual remains dissatisfied, they can also contact the Office of the Australian Information Commissioner as follows:

Office of the Australian Information Commissioner (OAIC) GPO Box 5218

Sydney NSW 2001

www.oaic.gov.au

Note: Complaints must be made in writing

3.10 Contacting Cubic Housing about Privacy

Individuals may contact Cubic Housing with regards to the following matters:

Matter Contact Details and Options

- To access, update or correct Personal Information
- To opt out of receiving newsletters or Cubic Housing related direct marketing material

Telephone: (02) 9264 4820 Email: cubicrealestate2email.propertyme.com

Address: Level 8, 503-505 Kent Street, Sydney, NSW, Australia

- To seek more information about anything contained in this policy
- To make a privacy related complaint or feedback:

Telephone: (02) 9264 4820 Email: cubicrealestate2email.propertyme.com

Address: Level 8, 503-505 Kent Street, Sydney, NSW, Australia

4. Definitions

Director – a person who is a Director of Cubic Housing Limited

Employee – any person employed by, or engaged to represent Cubic Housing including contractors, volunteers and students

Employment Candidate – a person who makes an application for employment with Cubic Housing

Cubic Housing Client – for the purpose of this Policy, a person who uses or applies to use goods or services provided by Cubic Housing

Personal Information – “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 a material form or not”

Record of Understanding (ROU) – is an agreement between NSW Police and registered community housing providers that facilitates the exchange of information in relation to crime and anti-social behaviour

Sensitive Information –

(a) information or an opinion about an individual’s:

(i) racial or ethnic origin; or

(ii) political opinions; or

(iii) membership of a political association; or

(iv) religious beliefs or affiliations; or

(v) philosophical beliefs; or

(vi) membership of a professional or trade association; or

(vii) membership of a trade union; or

(viii) sexual orientation or practices; or

(ix) criminal record;

(b) that is also personal information; or

(c) health information about an individual; or

(d) genetic information about an individual that is not otherwise health information; or

(e) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or

(f) biometric templates

5. Related resources

Australian Privacy Principles 2014

Privacy Act 1988 (Cth)

Privacy Amendment (Enhancing Privacy Protection) Act 2012

Office of the Australian Information Commissioner – www.oaic.gov.au

This Policy is subject to change from time to time at the discretion of the Company. Any approvals required under this Policy will be granted in accordance with the Company Delegations of Authority Policy. Further information on this Policy and other topics, is available on the Cubic Housing website www.cubichousing.com.au. If you have any specific questions regarding this Policy, please contact Cubic Housing on (02) 9264 4820 or email your enquiry to cubicrealestate@email.propertyme.com.