

PRIVACY CHARTER

1. Purpose

- 1.1 South East Water Corporation “South East Water” is a water corporation established under the *Water Act 1989 (Vic)*. South East Water brings you high quality water and takes away wastewater. We are responsible for managing and maintaining the water and sewerage networks.
- 1.2 Protecting your privacy and personal information is important to us. We recognise the trust placed in us when you supply us with your personal information.
- 1.3 We are bound by the Information Privacy Principles under the *Privacy and Data Protection Act 2014 (Vic)* “PDP Act” in handling your personal information. When it comes to your health information we are also bound by the *Health Records Act 2001 (Vic)*. This Privacy Charter explains how we handle your personal information.
- 1.4 This Privacy Charter applies to all South East Water employees and service providers.
- 1.5 All references in this Privacy Charter to “we”, “us” and “our” are to South East Water.

2. Collection

- 2.1 We may collect personal information that we require for the purpose of our business activities, functions and as otherwise required or permitted by law. These include, for example, so we can contact you in relation to your water or sewerage services or account, if we detect a leak or where you make a request to us.
- 2.2 We may collect personal information in a number of ways including, over the counter and using forms, the telephone, internet and using digital metering. If you do not provide us with personal information we request then we may not be able to supply you the services or products requested.
- 2.3 The types of personal information we will collect from you will depend on the circumstances in which that information is collected. These may include:
 1. identifying details (i.e. your name, date of birth, driver licence details, pension card numbers, concession card holders, credit information);
 2. contact details (i.e. current and previous addresses, email, phone and facsimile details);
 3. health information for the purposes of applying payment concessions;
 4. information about your employment (eg, place of work, position, authority to transact with us, etc.);
 5. information on prior dealings with us;

6. information regarding the use of our websites, including the domains from which website users visit, IP addresses, the dates and times of visits, activities undertaken on our website, cookies and other clickstream data;
7. close to real time water usage recorded by digital meters.

3. Sensitive Information

- 3.1 We will not collect sensitive information about you unless you have consented, the collection is permitted or required under law, the collection is necessary to lessen or prevent a serious and imminent threat to the life or health of an individual, or the collection is necessary for a legal or equitable claim.

4. Website Collection & Cookies

- 4.1 When you use our websites we may collect personal information about you, and this personal information may be used for:
 1. monitoring use of our website;
 2. the purpose of providing and promoting water and sewerage related services and products; and
 3. research.
- 4.2 Information collected may include the dates and times you access our website, the domains from which you visit, your activity in our website and your Internet Protocol address. This information is sometimes called “clickstream data”. We may use this data to analyse trends and statistics in order to improve the service we provide through our website.
- 4.3 We may use cookie technology on our websites to provide information and services to web site 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 web browsers are set to accept cookies. Cookies are useful to estimate our number of visitors and determine overall traffic patterns through our website. 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.

5. Use and Disclosure

- 5.1 We will store, use and disclose personal information to conduct and improve our business activities and may provide the personal information to contractors or third parties (including account collection and credit reporting agencies) for these purposes
- 5.2 An example of where we may use or disclose personal information to conduct and improve our business activities is in relation to our progressive roll-out of digital water meters. Digital water meters allow us to ensure accurate meter reading, help us to detect leaks quickly and identify abnormal water usage patterns. Digital water meter information may therefore be disclosed to property owners, occupiers and

contractors or third parties for these purposes (including, for example, to perform network analytics, research and other water or resource saving activities).

- 5.3 We may also use and disclose personal information to facilitate our compliance with relevant statutory and other legal obligations. This includes, for example, disclosing personal information to other statutory agencies, local government, the Victorian Government and the Commonwealth Government to facilitate our or their compliance with their statutory and legal obligations and to facilitate their enforcement of applicable laws.
- 5.4 The personal information we collect will not be used or disclosed for any purpose not set out in this Privacy Charter without your consent, unless permitted under the PDP Act.
- 5.5 We do not sell, rent or trade or otherwise make your personal information available except for the purposes mentioned in this Privacy Charter.

6. Data Quality

- 6.1 We make every effort to ensure the personal information we collect, use and disclose, is complete, accurate and relevant for the purposes of our use or disclosure.

7. Data Security

- 7.1 We take all reasonable steps to securely store and protect the information we hold from interference, unauthorised use, disclosure, access, modification, loss or misuse. This includes confidentiality requirements for employees and contractors and having in place document storage security, policies, systems and site access restrictions.
- 7.2 We safeguard and help prevent unauthorised access to personal information, to maintain data security and ensure we use and disclose the information we collect appropriately. In the event of any unauthorised access to, use or disclosure of your personal information, we will respond in accordance with our obligations under the PDP Act, relevant guidelines and our internal incident response plan.
- 7.3 Where we hold your personal information in conjunction with the personal information of others (e.g. where an account is a joint one), we will allow you to access to your own personal information and the joint information (e.g. account balance and transaction details) but not the personal information of other individuals.
- 7.4 We will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose.

8. Openness

- 8.1 This Privacy Charter sets out the sort of personal information we hold, for what purposes, and how we collect, use and disclose that information.

9. Access and Correction

- 9.1 You may request access to your personal information held by us by contacting us.
- 9.2 If you notify us that personal information we hold is not accurate, complete or up to date then we will take reasonable steps to correct the information.
- 9.3 You may request access to your personal information by contacting our Privacy Officer by post:

The Privacy Officer
South East Water
PO Box 2268
Seaford VIC 3199

Or by sending an email containing your request to: foi@sew.com.au.

- 9.4 Please provide us with as much detail as possible about the particular information you seek to help us retrieve it. Please note we may charge for the reasonable cost of processing a request and in some instances you may need to make an application under the *Freedom of Information Act 1982* (Vic).

10. Unique Identifiers

- 10.1 We will not assign unique identifiers to you unless the assignment of unique identifiers is necessary to enable us to carry out any of our functions efficiently. Further, we will not require an individual to provide a unique identifier (ie your tax file number) unless required or authorised by law.

11. Anonymity

- 11.1 Wherever it is lawful and practicable, we will provide you with the option of not identifying yourselves when entering into transactions with us.

12. Information Disclosed Overseas

- 12.1 Some of your information including names, addresses and contact details collected by South East Water, is maintained in South East Water's Customer Relationship Management application which is outsourced to a cloud service provider, currently located in Australia and the USA. We take reasonable steps to ensure that the overseas recipient of your personal information handles your personal information in accordance with the PDP Act.
- 12.2 We may transfer personal information about you to someone who is outside Victoria if we reasonably believe that 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, the individual consents or as otherwise provided for in PDP Act.

13. Enquiries and Complaints

- 13.1 You can contact South East Water’s Privacy Officer if you have questions about our Privacy Charter. The Privacy Officer can be contacted via email at foi@southeastwater.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 your concerns. Usually a phone call is all that is needed to resolve most issues.
- 13.3 You may complain to the Office of the Victorian Information Commissioner “Commissioner”, in writing, about an act or practice by us that may be an interference with your privacy. The Commissioner can be contacted via email at enquiries@ovic.vic.gov.au. For more information see the Commissioner’s website ovic.vic.gov.au

14. Future changes

- 14.1 We may change this Privacy Charter at any time and will notify you by posting an updated version of the Privacy Charter on our website. If at any point we decide to use your personal information in a manner materially different from that stated at the time it was collected, we will notify you by email or via a prominent notice on our website, and where necessary, seek your prior consent.

15. Approval

Approved by: South East Water Board
Approved on: 30 August 2021
Sponsor: General Manager, Legal and Governance
Implementer: Privacy Officer
Review date: August 2023