

## Privacy policy

### 1. Purpose and scope

- 1.1 City West Water Corporation (trading as Greater Western Water) ABN 70 066 902 467 (GWW) and its employees respect the privacy of all customers and other individuals. This Privacy Policy (Policy) explains how we handle your personal information.
- 1.2 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.
- 1.3 This Policy also applies to all GWW employees and service providers. 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 performing our functions under the *Water Act 1989* (Vic) (**Water Act**), 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 numbers, 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 via the GWW website;
  - 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 etc);
- 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 agent or authorised 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 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 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.
- 3.4 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 paragraph 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 or to correct your personal information. If that is the case, we will give you our reasons for that 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 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.
- 6.3 GWW will take reasonable steps to destroy or permanently de-identify your personal information if it is no longer needed for any purpose.
- 6.4 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) electronic copies of this policy on our website ([www.gww.com.au](http://www.gww.com.au)); or
  - (b) in hard copy by contacting the Legal Counsel – Governance, FOI and Privacy.
- 7.1.2 access to other privacy related information:
- (a) an Online Privacy Statement, available on our website, that 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) printed privacy-related advice on our various application forms, Customer Charter and customer accounts.
- 7.2 We will update and correct our records when you advise that your personal information 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.

### 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 assignment of unique identifiers is necessary to enable us to carry out our functions efficiently. We will not adopt a unique identifier that has been assigned by another organisation or use or disclose a unique identifier to you by another organisation unless the requirement of the privacy laws 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 or under 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](mailto: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 complaint to the Office of the Victorian Information Commissioner (**OVIC**), in writing, 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. OVIC can be contacted via email to: [enquiries@ovic.vic.gov.au](mailto:enquiries@ovic.vic.gov.au) or see [here](#) for further information.

## 14. Roles and responsibilities

All 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 (details above at paragraph 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 22 June 2021**  
**Next due for review by the Board on 22 June 2023**

**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