Docusign Envelope ID: 4DD9E533-5230-4A33-A7B8-97EC006AB419

nhulunbuy corporation



PRIVACY POLICY

POLICY – CO13

Docusign Envelope ID: 4DD9E533-5230-4A33-A7B8-97EC006AB419

Title	**Privacy Policy**
Policy number	CO13
Type	Corporate and Community
Owner	Chief Executive Officer
Responsible Officer	Chief Executive Officer
Approval date	March 2025
Next review date	March 2028

1. Purpose

The purpose of this policy is to set out the Nhulunbuy Corporations (NC) commitment to comply with the provisions of the Information Act (NT) and Information Privacy Principles (IPP's) when collecting and handling personal information.

2. Policy Objectives

NC considers the protection of all personal information to be an integral part of its commitment towards accountable management of information. NC acknowledges its obligation to protect the personal data of customers and staff in the possession of NC.

3. Definitions

For the purposes of this Policy, the following definitions apply:

NC Nhulunbuy Corporation Limited.

Personal Information
Information from which an individual's identity is apparent or can reasonably be ascertained. It includes information about a deceased person within the first five years after their death. It can include things like photos of a person or their property.

Sensitive Information
Personal information about an individual's racial or ethnic origin, political opinions, trade, political association, or trade union, philosophical or religious beliefs, sexual preferences or practices, criminal record or health information.

4. Policy Statement

Information we collect

4.1. NC will only collect personal information that it needs to carry out its functions and activities, including its statutory functions. This may include personal information of customers and staff.

4.1.1. When NC collects personal information, reasonable steps will be taken to ensure customers are aware of what information NC wants, for what purpose, whether any law requires NC to collect it, and the consequences, if any, of not providing the information.

Docusign Envelope ID: 4DD9E533-5230-4A33-A7B8-97EC006AB419

4.1.2. NC may also collate statistical information from the personal information it collects. This information may be used by NC and other government bodies to assist in reporting, and the provision of appropriate services and facilities. Once this kind of information is collected, it will be anonymised so that any compilation or publication of those statistics will not reveal your identity.

4.1.3. NC may collect personal information in a number of ways, including:

• directly in documents such as application forms, statutory declarations or from verbal or written correspondence; and

• from third parties such as government bodies

4.1.4. NC will only collect sensitive information with consent or if it is required by law.

4.2. Use and Disclosure

4.2.1. NC will not use or disclose personal information which has been collected for a particular purpose ("the primary purpose") or for another purpose ("the secondary purpose") unless:

• the secondary purpose is directly related to the primary purpose and one which the individual would reasonably expect;

• the individual consents; or

• to lessen or prevent serious harm or where disclosure is authorised by law. NC may use personal information in several ways, including:

• to carry out NC's functions;

• to provide customers with information about NC services;

• to determine and provide appropriate facilities;

• to administer and manage processes such as applications for permits, animal ownership, billing and collection of rates and charges, parking controls and development proposals; and

• to administer and make enquiries on personnel and recruitment matters.

4.2.2. In situations where NC requires a third party to collect, use or disclose information to perform NC functions, the third party will be bound by, and fully aware of their obligations to, the provisions of the Act and IPP's.

4.2.3. Where lawful, practical and permissible under NC policy. NC may give customers the option of not identifying themselves when supplying information or entering into transactions with NC and will advise of any consequences of remaining anonymous.

4.2.4. If requested by an individual, NC will take reasonable steps to inform an individual of the kind of personal information it holds, why it holds the information and how it collects, holds, uses and discloses the information.

Docusign Envelope ID: 4DD9E533-5230-4A33-A7B8-97EC006AB419

4.2.5. Upon request, NC will take reasonable steps to suppress personal details from publicly available material.

4.2.6. NC will only provide contact details of Customers with their consent.

4.2.7. Staff who are provided with a mobile phone and/or email account by NC to enable fulfilment of the requirements of their roles will have the mobile phone number and email address disclosed. No private contact details will be disclosed.

4.3. Security

4.3.1. NC will use reasonable measures to maintain a secure system for storing personal information and restrict access to staff who require personal information for purposes directly related to their responsibilities. Technological and operational policies and procedures are in place to protect personal information from misuse and loss and from unauthorised modification or disclosure. This includes physical security measures in NC facilities to protect customers and staff.

4.3.2. NC will dispose of or de-identify personal information where it is no longer necessary to fulfil the purposes for which the information was collected or as required by law.

4.4. Data Quality

NC will take all reasonable measures to ensure the information it collects is accurate, complete, and up to date.

4.5. Data Transfer

NC will not transfer personal information unless:

- the information is being transferred to the individual concerned.
- the transfer is required or authorised by law.
- the recipient is subject to laws substantially similar to the IPP's.
- the individual has consented, or the transfer is required for performance of a contract with the individual or that benefits the individual; or
- NC has taken reasonable steps to ensure that the information will not be held, used, or disclosed by the person to whom it is transferred in a manner that is inconsistent with this policy.

5. Making a privacy complaint

If you have a concern about your privacy, you have a right to make a complaint.

5.1. Lodging a privacy complaint

To lodge a complaint, please contact us or refer to our website for the Work Request and Feedback form. We will review your complaint.

Docusign Envelope ID: 4DD9E533-5230-4A33-A7B8-97EC006AB419

5.2 Responding to your privacy complaint

We will acknowledge every privacy complaint we receive and provide the name and contact details of a contact person within NC. We will keep you updated on our investigation into your concerns and aim to provide you with a final response within 30 days.

5.3 Review

If you are not satisfied with our handling of your privacy complaint, please refer to our Customer Feedback Policy which contains further options for escalation of complaints from the community.

6. More Information

For privacy related enquiries, access or correction requests, or complaints, please contact us at:

Nhulunbuy Corporation Limited
PO Box 345
NHULUNBUY NT 0881
Phone: (08) 8939 2200
Fax: (08) 8987 2451
Email: office@ncl.net.au

7. ASSOCIATED DOCUMENTS

ICT Policy

Code of Conduct

Customer Feedback Policy

8. Review process

This policy will be reviewed three years from the date of adoption.

Date	**Director (Name)**	**Signature**
25 March 2025	Andres Hoffman	Andres Hoffman
Chief Executive Officer (Name) **Shane Whitten**		**Signature** Shane Whitten