

## AOFM Privacy Policy

### Purpose

This Policy describes the AOFM's obligations and expectations for the collection, storage and handling of personal and sensitive information. This includes where personal information is handled by contractors on behalf of AOFM.

*Personal information* is information or an opinion about *an identified individual* or an individual who is reasonably identifiable.

*Sensitive information* is a *subset of personal information* and may include information or an opinion about such matters as your beliefs, origins, health status and/or criminal record.

### Specific Requirements in relation to Personal information

As a Non-corporate Commonwealth Entity (NCE) the AOFM is required to comply with the *Privacy Act 1988*, the Australian Privacy Principles and the Protective Security Policy Framework (PSPF). The AOFM ensures compliance with such storage, handling, and access requirements through this Policy and other policies and procedures, spanning areas of security, employment, recordkeeping and information management.

### The AOFM's privacy position

The AOFM only collects personal information where it is reasonably necessary and directly related to its functions and activities, or as required by law or policy directive. If personal information is not required to be retained, it will be destroyed or de-identified as soon as it is lawful and practicable to do so.

The AOFM will only disclose personal information in accordance with requirements in the *Privacy Act 1998* and PSPF, or where we have consent from individuals.

### What Personal Information does AOFM collect and hold?

The Australian Office of Financial Management collects and holds seven types of personal information:

1. Personnel records;
2. Financial system information;
3. Travel information;
4. Website analytics;
5. Email subscription lists;
6. Contact lists;
7. Procurement related data; and
8. Debt registers.

All information listed above is held in a combination of paper and electronic forms except for types 4 and 5 which are electronic only.

#### 1. *Personnel records*

Personnel records are created, stored, and disclosed to meet the employer responsibilities of the AOFM. These records maintain details of employment history, payroll, leave, demographic details, and a variety of employment-related administrative matters (e.g. identity, qualifications,

security clearance, performance, grievances, staff survey results, training and development). Personal information held in personnel records relates to current and former employees of AOFM. Paper records are stored in secure containers and electronic records are stored on a secure network with access control.

The AOFM payroll<sup>1</sup> is managed by the Department of The Treasury (The Treasury). This includes electronic records for pay, leave, employment history, home contact details, and other related data. Data is hosted on a protected network with backups. During pay processing, banking details of individuals are recorded and used by Treasury and AOFM's bank (the RBA).

The Treasury also provides work health and safety services under a record of understanding (includes records of accidents, injuries and rehabilitation cases on behalf of AOFM). Treasury's outsourced employee assistance program (EAP) provider maintains confidential individual counselling case files for matters concerning AOFM staff or their families. The EAP provider maintains de-identified and statistical data on AOFM-related use of their services for billing and client feedback.

Information relating to job applicants is collected and held by AOFM. From early 2015 through October 2017, this information was collected and stored in a proprietary database hosted by PageUp People Pty Ltd hosted on their Australian servers. From November 2017, this information is collected and stored in a proprietary database hosted by RecruitAdvantage Pty Limited (trading as TurboRecruit) hosted on their Australian servers. This information is used for employment selection and will, for successful applicants, be passed to vetting agencies for security clearance or background checking purposes.

Personal information contained in these records may be used or disclosed to allow employees to access their entitlements, for audit purposes, to meet external obligations, improve human resource systems, or for other official functions.

Information held in personnel records may be disclosed as required by legislation. This includes disclosures to the Australian Bureau of Statistics, the Australian Taxation Office, the Australian Public Service Commission, the Australian Public Service Commissioner, Fair Work Australia, involved unions, the Merit Protection Commissioner, the Department of Human Services, the National Archives of Australia, superannuation administrators, or a receiving agency following movement or re-engagement of an employee.

## **2. *Financial system information***

Personal information held in AOFM's financial systems enables AOFM to pay its bills and receive payments from identified parties and manage travel arrangements. Banking, contact and historical transactional details are collected and stored.

These records are kept on electronic and paper media. The AOFM utilises the Treasury's OneGov system as its financial management information system. Records relating to AOFM's financial management are recorded in these systems.

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<sup>1</sup> AOFM previously outsourced its payroll to Aurion Corporation Pty Ltd (Aurion) who managed electronic records associated with pay, leave, employment history, home contact details, emergency contacts, and equal employment opportunity data. This data is being archived and will no longer be accessed on a day to day basis. It is hosted on computers managed by Macquarie Telecom who create and maintain copies of data for backups and other data integrity management purposes. During pay processing, banking details of individuals were recorded and used by Aurion, their bank (the National Australia Bank and Westpac) and AOFM's bank (the Reserve Bank of Australia).

AOFM employees access accounts data according to functional need. Treasury employees involved in management of the OneGov system may access relevant personal information as required by their role.

The personal information contained in these records may be disclosed for making payments electronically or manually to the RBA, to Treasury employees involved in OneGov administration and as required to the AOFM's auditors.

### **3. *Travel information***

AOFM uses whole-of-government providers to manage business travel through QBT and AOT Hotels (both subsidiary companies of Helloworld Travel Limited whose privacy policy can be found [here](#)) and Diners Club International (a subsidiary of Citi whose privacy policy can be found [here](#)).

Access to these providers is mediated through 8Common Limited's Expense8 software and database. As a result, Expense8 holds information in relation to travellers including personal details of AOFM staff. Expense8 data is stored in Australia-based servers.

Personal data may be disclosed to administer travel and for making payments to staff and travel providers. AOFM and Treasury staff may access relevant personal information as required by their role.

### **4. *Website analytics***

To improve your experience on our website, we may use 'cookies'. A cookie is a small text file that our website may place on your computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser. However please note that if you do this, you may not be able to use the full functionality of this website.

Our website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of such other sites. When you go to other websites from here, we advise you to be aware and read their privacy policy.

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

By using this website, you consent to the processing of data about you by Google in the manner described in [Google's Privacy Policy](#) and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or [use the opt-out service provided by Google](#).

### **5. *Email subscription lists***

AOFM uses subscriber emails to send out information (which include planned tenders and tender results). We use MailChimp, which provides online tools that can be used to create, send, and manage emails. MailChimp may collect personal information, such as distribution lists which contain email addresses, and other information relating to those email addresses. For further information about the type of personal information MailChimp collects, refer to the [MailChimp Privacy Policy](#).

We will only use this information to:

- create, send and manage emails relating to the work of AOFM; and
- measure email performance.

MailChimp may transfer this information to third parties who process this information on MailChimp's behalf, or where otherwise required to do so by law. MailChimp collects information about:

- when you visit the website;
- when you use the services;
- your browser type and version;
- your operating system; and
- other similar information.

MailChimp is based in the United States of America (USA) and is subject to the laws of the USA. The information collected about your use of the AOFM website (including your IP address) will be transmitted to and stored by MailChimp on servers located outside Australia.

By subscribing to our emails, you will be taken to have consented to your personal information being used as described above. This means:

- You consent to your personal information being collected, used, disclosed and stored as set out in [Mail Chimp's Privacy Policy](#);
- You understand and acknowledge that this service utilises a Mailchimp platform, which is located in the United States of America (USA) and relevant legislation of the USA will apply;
- As you have consented to the disclosure of your personal information to MailChimp, Australian Privacy Principle 8.1 contained in Schedule 1 of the *Privacy Act 1988* will not apply;
- You understand and acknowledge that MailChimp is not subject to the *Privacy Act 1988* and you will not be able to seek redress under the *Privacy Act 1988*, but will need to seek redress under the laws of the USA; and
- You can opt out of our mailing list if you choose the 'unsubscribe' service provided by MailChimp in every email, or contact us.

MailChimp has the endorsement of [TRUSTe's Privacy Seal](#), which means responsible data collection and processing practices consistent with USA regulatory expectations and external standards for privacy accountability.

## 6. *Contact lists*

These contact details enable communication between AOFM employees and relevant business function contacts. Personal information relates to the contact details of individuals (person and organisation names, contact numbers, email addresses and postal addresses). There are no central files but AOFM employees maintain their own contact list and personal information (not usually disclosed). Records are deleted on request or during periodic updates.

## 7. *Procurement related data*

The purpose of these records is to assess potential suppliers for procurement purposes (including labour hire contracts). Personal information will be collected on key staff of a potential provider (may include person and organisation names, contact numbers, email addresses, qualifications,

work experience and postal addresses). Relevant AOFM employees will use this information to assess the quality of the potential provider. Personal information in either paper or electronic form contained in these records is not usually disclosed outside of AOFM.

#### **8. Debt registers**

Personal information held on the debt registers enables the AOFM to make payments to exchange-traded AGS holders in relation to associated interest and principal redemption. Personal information may include name, date of birth, address details, banking details, Tax File Number or Australian Business Number, payment instructions, and country of holding where relevant.

The AOFM holds records from the inscribed stock register relating to the period between 30 June 1992 and 30 June 2010 for the purposes of answering enquiries from stockholders on previous holdings and transactions. These records are held electronically and are accessed by AOFM employees involved in answering enquiries relating to the registry.

Computershare Investor Services Pty Limited (Computershare) maintains a register of inscribed stockholders on behalf of the Australian Government which includes stockholdings dating from 30 June 2010. These records are a mix of paper and electronic records. Computershare's [privacy statement](#) details how records are held and how to obtain information regarding access to personal information they hold.

Banking details in the registry are recorded and used by Computershare, their bank (the National Australia Bank) and AOFM's bank (the Reserve Bank of Australia).

#### **Disclosure to overseas recipients**

The AOFM does not directly disclose personal information that it holds to overseas recipients. Third party providers may send some personal information overseas either as part of their role (e.g. international travel), as described above, or as enumerated in their privacy policies.

#### **How to access and correct information**

If AOFM holds personal information about an individual, that person may be granted access to that information and the person may ask that AOFM correct such personal information.

AOFM will take all reasonable steps to meet such requests unless prohibited by law or under Australian Privacy Principle 12 (in which case we will notify the person in writing to explain). Employees can access, update or correct most of their details online.

#### **Privacy Roles**

The key privacy roles are:

- AOFM Privacy Champion who is the Chief Executive Officer; and
- AOFM Privacy Officer who is the Senior Advisor – People.

The Privacy Officer will ensure that this Policy reflects current requirements. The Privacy Officer will also ensure that all staff receive induction and general privacy awareness training, and that staff with specific operational requirements to deal with personal information are trained accordingly. The Privacy Officer will brief the Privacy Champion on the AOFM's privacy performance.

The Privacy Champion will maintain an awareness of AOFM's privacy issues and performance, and instruct the Privacy Officer to conduct privacy impact assessments when required.

### **How to make a complaint about privacy**

Full details of how AOFM manages complaints can be found in our [Privacy Complaint Handling document](#).

If you wish to make a complaint about how your personal information has been handled, first try to resolve the matter with the person you have been dealing with, or your supervisor (for staff). Unresolved complaints about privacy matters or potential breaches of the Australian Privacy Principles can be addressed to the AOFM *'Privacy Champion'*:

Mr Rob Nicholl, Chief Executive Officer  
Australian Office of Financial Management  
Treasury Building  
Langton Crescent  
PARKES ACT 2600  
Rob.Nicholl@aofm.gov.au  
(02) 6263 1111

In order for the Privacy Champion to appropriately handle complaints, individuals should clearly and succinctly state the specific nature of their complaint.

In the absence of a resolution under this approach, you can contact the [Office of the Australian Information Commissioner \(OAIC\)](#).