

## 1.0 INTRODUCTION

At Davenport Campbell we put people at the centre of the design process. It's a shift in emphasis towards human behaviour: what people want to do at work and how they want to interact. And we rely on tested insights to eliminate the guess work.

Quality research, behavioural science and data all help to inform the way we design to craft the most effective spaces for people to work productively and be happy. This evidence-based approach provides the navigation we need to guide the design of exceptional workplaces that genuinely support human activity.

We've created and curated a collection of research studies that help us achieve our purpose: to make life better for people at work through beautiful, data driven, logical design. For more information about Davenport Campbell please visit our website.

## 1.1 WHO SHOULD READ THIS PRIVACY POLICY?

You should read this policy if you are:

- an individual whose personal information may be given to or held by Davenport Campbell
- a contractor, consultant, supplier or vendor of goods or services to Davenport Campbell
- a person seeking employment with Davenport Campbell
- a person who is or was employed by Davenport Campbell (or its predecessor agencies).

## 1.2 THE PRIVACY ACT 1988

The Privacy Act 1988 (the Privacy Act) regulates how federal and ACT public sector agencies and certain private sector organisations can collect, hold, use and disclose personal information, and how you can access and correct information about you held by those agencies and organisations.

The definition of 'personal information' is broad. Generally,

- 'personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

The Privacy Act applies only to information about individuals, not to information about corporate entities such as businesses, firms or trusts. Detailed information on the Privacy Act can be found on the Office of the [Australian Information Commissioner \(OAIIC\) website](#).

## 1.3 DAVENPORT CAMPBELL AND PRIVACY

This Privacy Policy sets out how Davenport Campbell complies with the Privacy Act.

In performing its functions and administering its legislation, Davenport Campbell may collect, hold, use or disclose your personal information. Davenport Campbell takes privacy seriously and will only collect, hold, use and disclose your personal information in accordance with the Privacy Act.

If Davenport Campbell does not receive personal information about you the Privacy Act will not apply.

## 1.4 REMAINING ANONYMOUS OR USING A PSEUDONYM

Davenport Campbell understands that anonymity is an important element of privacy and some members of the public may wish to be anonymous when interacting with Davenport Campbell.

Davenport Campbell also understands some members of the public may wish to use a pseudonym.

Generally, members of the public will have the right to remain anonymous or adopt a pseudonym when dealing with Davenport Campbell. However, it is not always possible to remain anonymous or adopt a pseudonym in order for us to interact with you effectively, and Davenport Campbell will inform you when this is the case.

## 1.5 INFORMATION COVERED UNDER THIS PRIVACY POLICY

This Policy applies to all personal information collected about you by Davenport Campbell, including any financial information you provide to Davenport Campbell (such as your credit card details), personal information collected through our social media websites, and information collected through service providers who deliver services for Davenport Campbell under contracts and grant agreements.

## 1.6 INFORMATION HELD BY CONTRACTED SERVICE PROVIDERS

Under the Privacy Act, Davenport Campbell is required to take contractual measures to ensure contracted service providers (including sub-contractors) comply with the same privacy requirements applicable to Davenport Campbell.

## 2.0 DAVENPORT CAMPBELL'S PERSONAL INFORMATION HANDLING PRACTICES

### 2.1 COLLECTION OF PERSONAL INFORMATION

Personal information about you may be collected by Davenport Campbell from you, your representative or a third party. We generally use forms, online portals and other electronic or paper correspondence or communication tools to collect this information.

Information may be collected directly by Davenport Campbell, by people or organisations acting on behalf of Davenport Campbell (e.g. contracted service providers), or by service providers funded to deliver services under Davenport Campbell grant agreements. Davenport Campbell may also obtain personal information collected by Commonwealth agencies, State or Territory government bodies, or other organisations.

From time to time personal information is provided to Davenport Campbell by members of the public without being requested by Davenport Campbell. If we receive unsolicited information, we will handle it in accordance with Australian Privacy Principle 4.

Davenport Campbell may hold a broad range of personal information in records relating to:

- employment and personnel matters for Davenport Campbell staff and contractors (including security assessments)
- the performance of its legislative and administrative functions
- individuals participating in Davenport Campbell funded programs and initiatives
- the management of contracts and funding agreements
- the management of fraud and compliance investigations
- the management of audits (both internal and external)

- complaints (including privacy complaints) or enquiries made to Davenport Campbell
- feedback provided to Davenport Campbell
- requests made to Davenport Campbell under the Freedom of Information Act 1982 (Cth)
- the provision of legal advice by internal and external lawyers.

Davenport Campbell will not ask you for any personal information which we do not need. The Privacy Act requires that we only collect information for purposes that are reasonably necessary for, or directly related to, the functions or activities of Davenport Campbell.

When we collect personal information, we are required under the Privacy Act to notify you of a number of matters. These include the purposes for which we collect the information, whether the collection is required or authorised by law, and any person or body to whom we usually disclose the information. Davenport Campbell provides this notification by issuing separate privacy notices on our paper-based forms and online portals related to particular programs and activities.

### 2.2 SOME PERSONAL INFORMATION MAY BE PROTECTED BY OTHER LEGISLATION

Some personal information collected by Davenport Campbell may be protected under protected information provisions (also referred to as secrecy provisions) under its portfolio legislation (e.g. the social security law; the family assistance law; disability services law and other laws). These protected information provisions contain rules for the collection, use and disclosure of information (which may include personal information) governed by the relevant legislation. These rules operate alongside the rules in the Privacy Act.

### 2.3 KINDS OF PERSONAL INFORMATION COLLECTED AND HELD

In performing its functions, Davenport Campbell collects and holds the following kinds of personal information (which will vary depending on the context of the collection):

- name, address and contact details (e.g. phone, email, residential or business address)
- photographs, video recordings and audio recordings of you

- information about your personal circumstances where relevant (e.g. marital status, age, gender, occupation, accommodation and relevant information about your partner or children)
- information about your financial affairs (e.g. payment details, bank account details and information about business and financial interests)
- information about your identity (e.g. date of birth, country of birth, passport details, visa details, drivers licence, birth certificates, ATM cards)
- information about your employment (e.g. work history, referee comments, remuneration)
- information about your background (e.g. educational qualifications, the languages you speak and your English proficiency)
- government identifiers (e.g. Centrelink Reference Number, Job Seeker Identification Number, or Tax File Number)
- information about assistance provided to you under Davenport Campbell funding arrangements, and
- information about your entitlements under Davenport Campbell portfolio legislation.

On occasion, a range of sensitive information may also be collected or held about you, such as information about:

- your racial or ethnic origin;
- your health (including information about your medical history and any disability or injury you may have) or
- any criminal record you may have.

#### **2.4 HOW DAVENPORT CAMPBELL COLLECTS AND HOLDS PERSONAL INFORMATION**

Davenport Campbell collects personal information through a variety of different methods including:

- paper-based forms
- electronic forms (including online forms)
- face to face meetings
- telephone communications
- email communications
- communications by fax
- Davenport Campbell websites

- Davenport Campbell social media websites and accounts
- data sharing, matching or linkage arrangements with other Australian Government and State and Territory government agencies

Davenport Campbell may also collect personal information through individual chats with virtual assistants (chatbots). Davenport Campbell requests that individuals do not share personal information with virtual assistants. However, if an individual shares personal information with a virtual assistant, that information will be recorded and handled in accordance with the Privacy Act.

Davenport Campbell may hold personal information in a range of paper-based and electronic records.

Storage of personal information (and the disposal of information when no longer required) is managed in accordance with the Australian Government records management regime, including the Archives Act 1983, agency-specific records authorities and general records authorities. This ensures your personal information is held securely.

#### **2.5 PURPOSES FOR WHICH PERSONAL INFORMATION IS COLLECTED, HELD, USED AND DISCLOSED**

Davenport Campbell collects and holds personal information for a variety of different purposes relating to its functions and activities including:

- performing its employment and personnel functions in relation to Davenport Campbell staff and contractors
- performing its legislative and administrative functions
- policy development, research and evaluation
- complaints and enquiries handling
- program management
- grant and contract management
- investigations, audits and fraud and compliance functions
- management of correspondence with the public.

Davenport Campbell uses and discloses personal information for the primary purposes for which it is collected. You will be given information about the primary purpose of collection at the time the information is collected from you or as soon as possible afterwards.

Davenport Campbell will only use or disclose your

personal information for secondary purposes where it is able to do so in accordance with the Privacy Act.

Davenport Campbell may also share your personal information with other government agencies or organisations if it is required or authorised by law.

Davenport Campbell undertakes written Privacy Impact Assessments for all high privacy risk projects that involve new or changed ways of handling personal information.

## 2.6 DATA SECURITY AND INTEGRITY

Access to personal information held within Davenport Campbell is restricted to authorised persons who are Davenport Campbell employees or contractors. Davenport Campbell takes all reasonable steps, including through contractual measures, to protect the personal information we hold and against loss unauthorised access, use, modification, or disclosure.

Electronic and paper records containing personal information are protected in accordance with Australian Government security policies.

Davenport Campbell regularly conducts audits to ensure we adhere to our protective and computer security policies.

Davenport Campbell takes all reasonable steps to ensure that the personal information it holds is accurate, up-to-date, complete, relevant, and not misleading.

## 2.7 HOW TO SEEK ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You have a right under the Privacy Act to access personal information we hold about you.

You also have a right under the Privacy Act to request corrections to any personal information that Davenport Campbell holds about you if you think the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

However, the Privacy Act sets out circumstances in which Davenport Campbell can decline access to or correction of personal information (e.g. where access is unlawful under a secrecy provision in portfolio legislation, where your information is integrated with information about other people, or where the personal information held is an opinion about you and not an objective fact).

To access or seek correction of personal information

we hold about you, please contact Davenport Campbell using the contact details set out at section 5 of this Policy.

It is also possible to access and correct documents held by Davenport Campbell under the Freedom of Information Act 1982 (the FOI Act). For information on this, please contact our FOI Coordinator (contact details are available on the Davenport Campbell webpage).

## 2.8 ACCIDENTAL OR UNAUTHORISED DISCLOSURE OF PERSONAL INFORMATION

Davenport Campbell will take seriously and deal promptly with any accidental or unauthorised disclosure of personal information.

Davenport Campbell and its contractors are subject to the Notifiable Data Breaches Scheme (NDB Scheme) under the Privacy Act, and we will act in accordance with the requirements of the NDB Scheme and the guidance of the OAIC in assessing and responding to suspected notifiable data breaches. Where a breach of personal information occurs that is likely to cause serious harm to individuals, we will notify the OAIC and affected individuals as required.

Legislative or administrative sanctions may also apply to unauthorised disclosures of personal information which is also protected information under secrecy provisions under Davenport Campbell portfolio legislation.

## 2.9 OUR WEBSITE

We manage the Davenport Campbell website.

Generally Davenport Campbell only collects personal information from its website where a person chooses to provide that information.

If you visit our website to read or download information, Davenport Campbell records a range of technical information which does not reveal your identity. This information includes your IP or server address, your general locality and the date and time of your visit to the website. This information is used for statistical and development purposes.

No attempt is made to identify you through your browsing other than in exceptional circumstances, such as an investigation into the improper use of the website.

Some functionality of the Davenport Campbell website is not run by Davenport Campbell and third parties may capture and store your personal information outside Australia. These third parties include (but are not limited to) Facebook, YouTube, MailChimp, SurveyMonkey, Twitter and Google, and they may not be subject to the Privacy Act at all or in the same way as Davenport Campbell. Davenport Campbell is not responsible for the privacy practices of these third parties and encourages you to examine each website's privacy policies and make your own decisions regarding their reliability.

The Davenport Campbell website contains links to other websites. Davenport Campbell is not responsible for the content and privacy practices of other websites and encourages you to examine each website's privacy policies and make your own decisions regarding the reliability of material and information found.

## 2.10 COOKIES

Cookies are used to maintain contact with a user through a website session. A cookie is a small file supplied by Davenport Campbell, and stored by your web browser software on your computer when you access the Davenport Campbell website. Cookies allow Davenport Campbell to recognise an individual web user, as they browse the Davenport Campbell website. It does not store any personal information. You may disable cookies by adjusting the settings on your web browser, but if you do this you may not be able to use the full functionality of the Davenport Campbell website.

## 2.11 ELECTRONIC COMMUNICATION

There are inherent risks associated with the transmission of information over the Internet, including via email. You should be aware of this when sending personal information to us via email or a Davenport Campbell website, including through virtual assistants (chatbots). If this is of concern to you then you may use other methods of communication with Davenport Campbell, such as post, fax, or phone (although these also have risks associated with them).

Davenport Campbell only records email addresses when a person sends a message or subscribes to a mailing list. Any personal information provided, including email addresses, will only be used or disclosed for the purpose for which it was provided.

If you interact with a virtual assistant (chatbot) on a Davenport Campbell website, your chat records will be kept by Davenport Campbell. If you wish to access your chat records, please contact us using the contact details set out at section 5 of this Policy.

## 2.12 DISCLOSURE OF PERSONAL INFORMATION OVERSEAS

Davenport Campbell will, on occasion, disclose personal information to overseas recipients. The situations in which Davenport Campbell may transfer personal information overseas include:

- the provision of personal information to overseas researchers or consultants (where consent has been given for this or Davenport Campbell is otherwise legally able to provide this information in accordance with protected information provisions),
- the provision of personal information to recipients using a web-based email account where data is stored on an overseas server, and
- the provision of personal information to foreign governments and law enforcement agencies (in limited circumstances and where authorised by law).

It is not practicable to list every country to which Davenport Campbell may provide personal information as this will vary depending on the circumstances.

However, you may contact Davenport Campbell (using the contact details set out at section 5 of this Policy) to find out which countries, if any, your information has been given to.

## 3.0 COMPLAINTS

### 3.1 HOW TO MAKE A COMPLAINT

If you think Davenport Campbell may have breached your privacy rights you may contact us using the contact details set out at section 5 of this Policy.

### 3.2 DAVENPORT CAMPBELL'S PROCESS FOR HANDLING COMPLAINTS

We will respond to your complaint or request promptly if you provide your contact details. We are committed to quick and fair resolution of any complaints and will ensure your complaint is taken seriously. You will not be victimised or suffer negative treatment if you make a complaint.

### **3.3 HOW TO COMPLAIN TO THE OFFICE OF THE AUSTRALIAN INFORMATION COMMISSIONER (OAIC)**

You also have the option of contacting the OAIC if you wish to make a privacy complaint against Davenport Campbell and if you are not satisfied with how we have handled your complaint in the first instance.

The OAIC website contains information on how to make a privacy complaint.

If you make a complaint directly to the OAIC rather than to Davenport Campbell, the OAIC may recommend you try to resolve the complaint directly with Davenport Campbell in the first instance.

### **4.0 PRIVACY POLICY UPDATES**

This Privacy Policy will be reviewed regularly and updated as required.

### **5.0 HOW TO CONTACT US**

#### **5.1 GENERAL ENQUIRIES AND REQUESTS TO ACCESS OR CORRECT PERSONAL INFORMATION**

If you wish to:

- query how your personal information is collected, held, used or disclosed
- ask questions about this Privacy Policy
- obtain access to or seek correction of your personal information

please contact the Davenport Campbell Feedback and Complaints Team using the following contact details:

- email: [dcinfo@davenport-campbell.com.au](mailto:dcinfo@davenport-campbell.com.au)
- telephone: +61 2 8233 5600
- post: Level 4, 122 Pitt Street, Sydney NSW 2000

#### **5.2 CONTACT DETAILS FOR PRIVACY COMPLAINTS**

If you wish to make a complaint about a breach of your privacy, please contact the Davenport Campbell Feedback and Complaints team using the following contact details:

- email: [dcinfo@davenport-campbell.com.au](mailto:dcinfo@davenport-campbell.com.au)
- telephone: +61 2 8233 5600
- post: Level 4, 122 Pitt Street, Sydney NSW 2000

#### **5.3 AVAILABILITY OF THIS POLICY**

If you wish to access this Policy in an alternative format (e.g. hard copy) please contact Davenport Campbell using the contact details set out at section 5 of this Policy.