



## Policy 3.2: Privacy and Confidentiality

### 1. Purpose

FutureNow—Creative and Leisure Industries Training Council Inc. (FutureNow) considers the privacy of your personal information to be very important. Maintaining commercial in confidence in relation to your commercially valuable information is also extremely important. This policy outlines how FutureNow collects, uses and discloses your personal information; how we maintain commercial in confidence; and how we ensure that all employees are aware of the need to protect private information and maintain confidentiality.

### 2. Scope

This policy applies to the FutureNow Board, all FutureNow employees, and FutureNow's Industry Advisory Networks.

### 3. Abbreviations and definitions

CEO: Chief Executive Officer

Commercial in confidence: Information that is confidential that, if disclosed, could cause damage to a party's commercial interests is termed commercial in confidence. Examples include sensitive, commercially valuable information, trade secrets and intellectual property. Commercial in confidence information cannot be released without permission from the owner, and unauthorised use of such information results in a breach of confidence.

CRM database: Customer Relationship Management database.

FutureNow: FutureNow—Creative and Leisure Industries Training Council Inc.

Personal information: Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether the information is recorded in a material form or not. Examples include a person's name, telephone number and email address. Personal information also includes very sensitive information such as opinions about a person's work performance, or details of a person's salary or criminal record.

### 4. Policy statement

FutureNow provides advice to industry, the training sector and government policy makers about workforce development across the creative, leisure and information technology industries. This involves collaboration with a wide range of people throughout the sector and from government to gather evidence to inform government policy about strategic workforce development. It also serves to influence the development of the national and state education and training sectors.

Where it is reasonably necessary for the performance of these functions and related activities, FutureNow collects both personal and commercial in confidence information.

FutureNow is committed to:

- treating your personal and commercial in confidence information with respect, and taking all reasonable and legal steps to manage and protect it;
- creating a culture of privacy that values personal and commercial in confidence information; and
- meeting our legal obligations.

This policy addresses FutureNow's collection, use and dissemination of the information it collects.

By providing information to FutureNow, individuals and organisations agree to our collection, use and disclosure of the information in accordance with this privacy policy.

FutureNow acknowledges the potential for information risk. While all such risks cannot be eliminated, they need to be managed to ensure they are as low as reasonably practicable. The monitoring and management of information risk is specifically addressed in FutureNow's Risk Monitoring and Management Policy.

## **5. Responsibilities**

Maintaining privacy and commercial in confidence is a shared responsibility between FutureNow's Board, its Industry Advisory Networks, the CEO and all other FutureNow employees.

## **6. Policy application**

FutureNow's commitment to maintaining the integrity of your personal and commercial in confidence information is demonstrated by the following.

### *6.1 Why information is collected*

FutureNow collects personal and/or commercial in confidence information to:

- allow us to carry out our purpose;
- manage, account for and improve our services;
- manage our relationships with our stakeholders, including government;
- provide stakeholders with news or information about particular topics or events;
- provide stakeholders with news or information about FutureNow; and
- comply with our legal obligations.

### *6.2 The type of information collected*

The type of personal information collected includes, for example, contact details—name, mailing address, phone numbers and email address; employer and employment position.

For FutureNow employees and Board members, as well as contact details we obtain additional personal information such as tax file numbers, emergency contact details, employment and education history, referee details and opinions, and other information as required by law.

Commercial in confidence information obtained includes information of a commercial nature disclosed to FutureNow in writing or in discussions in meetings or at events, for example.

### *6.3 How information is collected*

FutureNow:

- collects personal and commercial in confidence information lawfully, through fair and reasonable means. This includes information sent to us via email or post, face to face meetings, interviews, telephone discussions, business cards, organisational web sites, media tools such as LinkedIn, event registrations, and through surveys we conduct;
- collects personal information in our newsletter database in Mailchimp, an email automation platform;
- operates a Customer Relationship Management database (ACT) which is stored on Microsoft's Azure server and accessed online only by FutureNow's approved staff;

- collects personal information directly from the individual wherever possible; and
- takes reasonable steps to ensure the accuracy of information.

FutureNow does not collect information from visitors to our website and does not use cookies to build profiles of those who visit the site.

#### *6.4 Sharing and disclosing information*

Any private or commercial in confidence information will not be collected, used or disclosed in any way and for any reasons other than those related to the initial purpose of collecting it.

FutureNow will take reasonable steps to inform people and businesses of the purpose and relevance of the information collected. This information will not be distributed or forwarded to third parties without the prior consent of the individual or organisation concerned, unless required by law.

FutureNow does not sell your personal or commercial information under any circumstances.

FutureNow regularly conducts stakeholder surveys. Information from these is presented to third parties as aggregated quantitative and qualitative data. Survey information is also de-identified unless prior written consent to disclose personal or commercially sensitive information is obtained from the participating individuals and organisations.

#### *6.5 How information is protected*

FutureNow takes all reasonable care to prevent unauthorised access to, or disclosure of, your personal and commercial in confidence information. This includes:

- ensuring appropriate storage and security, including password protected access to our CRM database;
- protection of our Mailchimp newsletter database through a two step factor authentication process;
- ensuring all Board members, staff and Industry Advisory Network members are aware of our expectations in relation to privacy and commercial in confidence information; and
- destroying or de-identifying information not needed for the intended purpose as soon as possible.

#### *6.6 Keeping information accurate and up to date*

FutureNow aims to make sure that the information it holds is accurate, complete and up to date.

As fair, open and transparent management of information is important, individuals or organisations can contact FutureNow in writing to request access or corrections to their personal information. FutureNow may require further details to verify your identity before processing your request. FutureNow may also, under certain circumstances, refuse you access to your personal information—for example, if your identity is not satisfactorily verified, or for legal reasons.

Individuals or organisations can contact FutureNow and ask for their details to be included in our CRM. Similarly, they may write to us requesting they be removed from the CRM.

#### *6.7 Notification of changes to the Privacy Policy*

As part of its good governance processes, FutureNow will regularly review and, where necessary, amend this policy. The Privacy Policy is available via a link on the FutureNow website and we encourage you to periodically visit this page for the current policy.

## **7. Breaches**

All Board members, employees and Industry Advisory Network members are responsible for knowing, understanding and following the provisions of this Privacy Policy throughout the course of their involvement and/or employment with FutureNow. Failure to comply with any aspect of this policy may constitute misconduct and may result in disciplinary action, up to and including termination of employment or engagement.

## **8. Associated Documents**

FutureNow Human Resources Management Policies:

- Board Charter
- Code of Conduct
- Risk Monitoring and Management Policy