

<b>Reference No:</b>	
<b>Area(s):</b>	<b>Privacy</b>
<b>Version:</b>	<b>2.0</b>
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## Policy

ISMAPNG and its Corporate Entities commit to comply with the Commonwealth *Privacy Amendment (Enhancing Privacy Legislation) Act 2012* and the Australian Privacy Principles contained in this Act. ISMAPNG uses and manages personal information provided to or collected by it in accordance with this law and these principles.

ISMAPNG requires each of its separate incorporated ministries to comply with this Act and APPs and any other relevant privacy legislation and to develop policy, protocols and practices including the appointment of their own Privacy Officer in compliance thereof.

ISMAPNG and its Corporate Entities do not engage in Direct Marketing nor does it adopt, use or disclose Government related identifiers hence APPs 7 & 9 are not applicable.

Given the nature of its operation, it would be impracticable for ISMAPNG and its Corporate Entities to function if APP 2 – anonymity and pseudonymity were to apply.

ISMAPNG and its Corporate Entities adopt detailed procedures for handling each category of personal information collected and managed by ISMAPNG. These procedures are available to relevant persons on request via the Privacy Officer.

## Scope

This policy applies to all Sisters and Staff of ISMAPNG and its Corporate Entities

## Definitions

**Corporate Entities** means Institute Property Association Limited, Mercy Sisters Ltd and McAuley Property Limited

**Data breach** means a breach of personal information where it is lost or subject to unauthorised access, modification, disclosure or other misuse or interference.

**ISMAPNG** means Institute of Sisters of Mercy of Australia and Papua New Guinea, a religious institute of pontifical right and a public juridic person within the Catholic Church.

**Personal information** means any information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a. whether the information or opinion is true or not; and
- b. whether the information or opinion is recorded in a material form or not.

**Sisters** means all professed members of ISMAPNG and women who have been formally admitted to ISMAPNG's formation program.

**Staff** means a person, whether remunerated or not, working on behalf of ISMAPNG or its Corporate Entities including employees, contractors, sub-contractors, temporary staff and volunteers.

## Procedure

### Data Breach Response Plan

If a data breach occurs, the following process will be followed as a response plan.

A staff member or a Sister who becomes aware that a potential data breach has occurred should notify their supervisor or Community Leader, as appropriate. The Privacy Officer is then to be notified and the following steps taken:

- The Privacy Officer will advise if a data breach has in fact occurred
- The Privacy Officer will work with senior leaders as appropriate to contain the breach and do a preliminary assessment of the impact of the breach, including an evaluation of the risks
- The Privacy Officer will, in conjunction with the General Counsel, determine if the breach is notifiable to the person to whom the information refers and/or to the Office of the Australian Information Commissioner
- The Privacy Officer and senior leaders will recommend and put in place measures to prevent future breaches.

If an individual needs clarification or assistance with any matter related to ISMAPNG or its Corporate Entities' collection or use of personal information the Privacy Officer for ISMAPNG should be contacted.

Privacy Officer  
Institute of Sisters of Mercy of Australia and Papua New Guinea  
720 Heidelberg Road (PO Box 5067)  
Alphington Vic 3078

Email: [privacy@ismapng.org.au](mailto:privacy@ismapng.org.au)

ISMAPNG will update this privacy policy and procedure from time to time. Any updated versions of this policy and procedure will be posted on our website.

## Version Control Page

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