

# CICL Privacy Policy



## 1. Purpose of the Policy

Coleambally Irrigation Co-operative Limited (CICL) recognises the importance of protecting the privacy of the personal information it collects. CICL respects individual rights to privacy under the *Privacy Act 1988* (Cth) (the Act) and is required to comply with the Australian Privacy Principles (2014).

This Privacy Policy describes how CICL collects, uses, discloses and manages personal information.

The Information Security Policy is designed to protect CICL's corporate data, confidential information, user safety, and privacy, and is used to guide CICL's management and operational standards to ensure that the availability, confidentiality and integrity of business information is maintained.

The Privacy Policy also applies to WaterMart™.

## 2. Personal Information

This policy assumes 'personal information' has the meaning given in the Act which in summary is as follows:

*'information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.'*

## 3. Collection of personal information

CICL collects or holds information about individuals which includes staff, directors, members and customers which is essential to the operation of its business which includes but is not limited to:

- provision of water delivery services and drainage services to its members and customers
- management and operation of irrigation works and assets and infrastructure for the supply of water
- the operation of its registers for land, water and delivery entitlements
- administration of its entitlements contract with members and customers
- the operation of WaterMart™
- the facilitation of payment of Government funding to members and customers
- provision of agricultural services as the Board may determine.

CICL also collects the personal information of contractors and consultants as part of its routine business operations.

Individuals have the right to anonymity or can provide a pseudonym when contacting CICAL, unless it is impracticable or identification is a legal requirement.

The personal information CICAL may collect and hold includes, but is not limited to:

- Name, date of birth and contact details
- Trading name and or company details including ACNs
- Business and financial data include ABNs
- Bank account and credit card details
- Details of security interests in members' contractual rights
- Landholding information including land titles, area, LWMP related projects (i.e. EM-31, whole farm plans), soil types, groundwater information including groundwater levels, water use and crop types
- Details of annual allocation trading, entitlement transactions and transformations
- Water entitlement and delivery entitlement numbers held in the Members' register
- Details of a member's shares held
- Details of property transactions
- Records of correspondence and meetings with individuals which may include unsolicited personal information
- Curriculum Vitae, qualifications and licences relevant to employment or employment applications
- Tender information and details of contractors and their employees, including insurance cover.

CICAL may also collect personal information from Government agencies or departments and title search agents, where it is required to provide services to individuals.

CICAL is required to collect certain personal information under laws including but not limited to the following:

- The *Water Act 2007* (Cth) and associated legislative instruments which requires disclosure of data to the Bureau of Meteorology
- The Australian Competition and Consumer Commission's information requests under the *Water Act 2007* (Cth) and the *Competition and Consumer Affairs Act 2010* (Cth)
- The *Water Management Act 2000* (NSW) including CICAL's Combined Water Supply Work Approval and Water Use Approval, issued under the *Water Management Act 2000*
- CICAL's Environment Protection Licence under the *Protection of the Environment Operations Act 1997* (NSW)
- The *Co-operatives Act 1992* (NSW)
- Co-operatives National Law

#### 4. Purpose of collecting, holding, use or disclosure of personal information

Key reasons why CICAL collects, holds, uses and discloses personal information include:

- To communicate with the individuals
- To allow CICAL to supply its business services to its members and customers
- To allow CICAL to deliver government funding programs to its members and other programs/activities which members and customers may be involved in

- To provide members and customers with access to protected areas of websites
- To provide members and customers with information about its products and services
- To allow account management, including billing and payment processing
- For business planning which may include data analysis, policy development, marketing and research and development
- To comply with any legislative requirements or conditions on CICAL's licences.

## 5. Access to and correction of personal information

Any individual whose personal information is held by CICAL may request access to that information by contacting CICAL via email, telephone, in person or in writing. CICAL reserves the right to verify the identification of individual(s) requesting information. CICAL will endeavour to provide individuals with information they are entitled to by a suitable method (for example by emailing, mailing or personal inspection). Where CICAL is not required to provide the personal information CICAL will provide the reasons why. No fee will apply to a request for personal information; however CICAL reserves the right to charge a fee to recover the costs of retrieving the personal information in accordance with CICAL Rule 133 (Notices).

Personal information can be updated or corrected by contacting CICAL at the contact details below.

Members and Customers can correct their contact information by completing the [Customer Communication Form](#).

## 6. Disclosure of personal information (including to overseas recipients)

CICAL may disclose personal information:

- To its representatives, contractors or third party service providers engaged by CICAL to provide services, including computer/software hosting, infrastructure/works, consultancy, billing, financing, data collection and research and development
- To meet its licence and compliance obligations including reporting and registration
- To prospective Board members but only in connection to Board elections
- With the consent of an individual or their legal representatives on the individual's behalf
- Where required or authorised by the law.

CICAL stores personal information in electronic form using cloud-based services. This may include the storage of personal information overseas.

## 7. Storage and security

Personal information collected is stored in a range of ways, including on CICAL information technology systems and databases or in paper based files.

CICAL's Information Security Policy is designed to protect information from misuse, interference or loss and also from unauthorised access, modification or disclosure. Part of the Information Security Policy is a Security Incident Response Plan (SIRP) that includes measures to minimise damage caused by an information security incident.

## 8. Complaints and questions

To lodge complaints or questions about CICAL's Privacy Policy, or if an individual believes CICAL has breached its Privacy Policy, the individual should contact the Company Secretary at the contact details below.

CICAL will record all complaints. After receiving a complaint CICAL will:

- Appoint a staff member to investigate the complaint/issue
- Request further information to improve its understanding of the complaint/issue if considered appropriate
- Take appropriate corrective actions to resolve the complaint or rectify the issue
- Write to the individual to communicate the action(s) taken.

CICAL's Rules 131 and 132 also provide for dispute resolution and the establishment of a dispute's committee.

## 9. Changes

In the event CICAL changes its Privacy Policy the updated policy will be available from CICAL's website [www.colyirr.com.au](http://www.colyirr.com.au).

## 10. Contacting CICAL

For further information, please contact:

7 Brolga Place/PO Box 103

Coleambally NSW 2707

Phone 02 6954 4003

Facsimile 02 6954 4321

Email [cosec@colyirr.com.au](mailto:cosec@colyirr.com.au)

### POLICY VERSION AND REVISION INFORMATION

Policy Authorised by: Clifford Ashby Title: CEO	December 7/12/2017
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Policy Maintained by: Bronwyn Vearing subject to annual review Title: Company Secretary	Current version: 15/2/2021
Policy Maintained by: Bronwyn Vearing subject to annual review Title: Company Secretary	Reviewed August 2022